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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

AARON SENNE, *et al.*,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF  
 BASEBALL, an unincorporated association  
 doing business as MAJOR LEAGUE  
 BASEBALL, *et al.*,

Defendants.

Case No. CV 14-00608 JCS (consolidated  
 with 3:14-cv-03289-JCS)

Hon. Joseph C. Spero

**CLASS ACTION**

**DECLARATION OF ELISE M.  
 BLOOM IN SUPPORT OF  
 DEFENDANTS' MOTION FOR  
 PARTIAL SUMMARY JUDGMENT**

1 I, Elise M. Bloom, declare as follows:

2 1. I am a partner at Proskauer Rose, LLP, counsel for all Defendants in this matter.

3 2. I submit this declaration in support of the Defendants' Motion for Partial  
4 Summary Judgment.

5 3. I have personal knowledge of the facts contained in this declaration, and if called  
6 to testify, I could and would testify competently thereto.

7 4. Attached hereto as **Exhibit 1** is a summary chart reflecting the MLB Clubs'  
8 "establishments" at their minor league affiliate stadiums, including the months and years of  
9 operation of each "establishment" and the number of the Clubs' year-round employees at each  
10 "establishment," if any. As noted in Exhibit 1, the documents relied upon in creating the  
11 summary chart include the Clubs' Interrogatory Answers and Objections and/or sworn  
12 declarations, game schedules and media guide excerpts.

13 5. Attached hereto as **Exhibit 2** is a summary chart reflecting the MLB Clubs'  
14 "establishments" at their spring training facilities in Florida or Arizona, including the years of  
15 operation of each "establishment," and the analysis of the average of the gross receipts derived  
16 by the Club from its baseball-related activities at each "establishment" during the lowest six  
17 months compared to the highest six months of each year. As noted in Exhibit 2, the documents  
18 relied upon in creating the summary chart include the Clubs' Interrogatory Answers and  
19 Objections, sworn declarations, maps and media guide excerpts. Because this document has  
20 been marked as "Confidential-Restricted" pursuant to the Parties' stipulated protective order  
21 (Dkt. No. 233), it has been filed under seal and an administrative motion is being filed along with  
22 this motion.

23 6. Attached hereto as **Exhibit 3** is a true and correct copy of relevant excerpts of the  
24 Arizona Diamondbacks Media Guides, bearing Bates Numbers MLBARI001631,  
25 MLBARI000064-MLBARI000069, MLBARI001248, MLBARI001269-MLBARI001270,  
26 MLBARI001549-MLBARI001555, MLBARI000176, MLBARI000193, MLBARI000429-  
27 MLBARI000435, MLBARI000579, MLBARI000596, MLBARI000826-MLBARI000832,  
28 MLBARI000871, MLBARI000885, MLBARI001118-MLBARI001124, MLBARI001745,

MLBARI001761, MLBARI001990-MLBARI001996, MLBARI0002747, MLBARI0002762,  
 MLBARI0002982-MLBARI0002988, MLBARI0003028, MLBARI0003043,  
 MLBARI0003263-MLBARI0003269, MLBARI0002511, MLBARI0002527,  
 MLBARI0002720-MLBARI0002726, MLBARI0002063, MLBARI0002079,  
 MLBARI0002273-MLBARI0002279, MLBARI0002299, MLBARI0002316,  
 MLBARI0002491-MLBARI0002493 and MLBARI0002495.

7. Attached hereto as **Exhibit 4** is a true and correct copy of the relevant excerpts of  
 Atlanta Braves Media Guides, bearing Bates Numbers MLBATL0001273, MLBATL0001483-  
 MLBATL0001494, MLBATL0001732, MLBATL0000620, MLBATL0000816-  
 MLBATL0000827, MLBATL0001053, MLBATL0000001, MLBATL0000187-  
 MLBATL0000198, MLBATL0000430, MLBATL0001739, MLBATL0001938-  
 MLBATL0001950, MLBATL0002186, MLBATL0002494, MLBATL0002733-  
 MLBATL0002744, MLBATL0002989, MLBATL0004454, MLBATL0004707-  
 MLBATL0004709, MLBATL0004713-MLBATL0004724, MLBATL0004975,  
 MLBATL0004984, MLBATL0005259- MLBATL0005273, MLBATL0005508,  
 MLBATL0003970, MLBATL0004215, MLBATL0004225-MLBATL0004239,  
 MLBATL0004446, MLBATL0003504, MLBATL0003767- MLBATL0003769,  
 MLBATL0003771-MLBATL0003773, MLBATL0003964, MLBATL0003028,  
 MLBATL0003304-MLBATL0003305 and MLBATL0003496.

8. Attached hereto as **Exhibit 5** is a true and correct copy of the relevant excerpts of  
 Baltimore Orioles Media Guides, bearing Bates Numbers BO000373, BO000592, BO000594-  
 BO000596, BO000598- BO000600, BO000602- BO000604, BO000606-BO000608, BO000610-  
 BO000612, BO000614-BO000615, BO000754, BO000758, BO000879- BO000888, BO000959,  
 BO000962, BO001089-1098, BO001177, BO001180, BO001433-BO001454, BO001606,  
 BO001610, BO001751- BO001763, BO001846, BO001849, BO002117-BO002142 and  
 BO002334.

9. Attached hereto as **Exhibit 6** is a true and correct copy of the relevant excerpts of  
 Boston Red Sox Media Guides, bearing Bates Numbers MLBBOS0002805, MLBBOS0003257-

1 MLBBOS0003274, MLBBOS0003334, MLBBOS0001698, MLBBOS0002162-  
 2 MLBBOS0002163, MLBBOS0002165-MLBBOS0002166, MLBBOS0002168-  
 3 MLBBOS0002169, MLBBOS0002171-MLBBOS0002172, MLBBOS0002174-  
 4 MLBBOS0002175, MLBBOS0002234, MLBBOS0003933, MLBBOS0004431-  
 5 MLBBOS0004432, MLBBOS0004434-MLBBOS0004435, MLBBOS0004437-  
 6 MLBBOS0004438, MLBBOS0004440-MLBBOS0004441, MLBBOS0004443-  
 7 MLBBOS0004444, MLBBOS0004502-MLBBOS0004503, MLBBOS0003341,  
 8 MLBBOS0003846-MLBBOS0003848, MLBBOS0003850-MLBBOS0003851,  
 9 MLBBOS0003853-MLBBOS0003854, MLBBOS0003856-MLBBOS0003857,  
 10 MLBBOS0003859-MLBBOS0003860, MLBBOS0003928-MLBBOS0003929,  
 11 MLBBOS0004803, MLBBOS0005332-MLBBOS0005334, MLBBOS0005336-  
 12 MLBBOS0005337, MLBBOS0005339-MLBBOS0005340, MLBBOS0005342-  
 13 MLBBOS0005343, MLBBOS0005345-MLBBOS0005346, MLBBOS0005407-  
 14 MLBBOS0005408, MLBBOS0000851, MLBBOS0001340-MLBBOS0001342,  
 15 MLBBOS0001344-MLBBOS0001346, MLBBOS0001348-MLBBOS0001349,  
 16 MLBBOS0001351-MLBBOS0001352, MLBBOS0001354-MLBBOS0001355,  
 17 MLBBOS0001417-MLBBOS0001418, MLBBOS0006938, MLBBOS0007404-  
 18 MLBBOS0007406, MLBBOS0007408-MLBBOS0007410, MLBBOS0007412-  
 19 MLBBOS0007413, MLBBOS0007415-MLBBOS0007416, MLBBOS0007418-  
 20 MLBBOS0007419, MLBBOS0007484-MLBBOS0007485, MLBBOS0007501,  
 21 MLBBOS0007935-MLBBOS0007937, MLBBOS0007939-MLBBOS0007941,  
 22 MLBBOS0007943-MLBBOS0007944, MLBBOS0007946-MLBBOS0007947,  
 23 MLBBOS0007949-MLBBOS0007950, MLBBOS0008011-MLBBOS0008012,  
 24 MLBBOS0006438, MLBBOS0006864-MLBBOS0006866, MLBBOS0006868-  
 25 MLBBOS0006870, MLBBOS0006872-MLBBOS0006873, MLBBOS0006875-  
 26 MLBBOS0006876, MLBBOS0006878-MLBBOS0006879, MLBBOS0006932-  
 27 MLBBOS0006933, MLBBOS0005906, MLBBOS0006354-MLBBOS0006356,  
 28 MLBBOS0006358-MLBBOS0006360, MLBBOS0006362-MLBBOS0006363,

1 MLBBOS0006365-MLBBOS0006366, MLBBOS0006368-MLBBOS0006369,  
 2 MLBBOS0006432-MLBBOS0006433, MLBBOS0005438, MLBBOS0005837-  
 3 MLBBOS0005738, MLBBOS0005840-MLBBOS0005842, MLBBOS0005844,  
 4 MLBBOS0005846 and MLBBOS0005900-MLBBOS0005901.

5 10. Attached hereto as **Exhibit 7** is a true and correct copy of relevant excerpts of the  
 6 Chicago Cubs Media Guides, bearing Bates Numbers MLBCHC000469, MLBCHC001520,  
 7 MLBCHC002250-MLBCHC002261, MLBCHC001542, MLBCHC001720-MLBCHC001731,  
 8 MLBCHC001884-MLBCHC001885, MLBCHC001887, MLBCHC002081-MLBCHC002092,  
 9 MLBCHC002244-MLBCHC002245, MLBCHC000056, MLBCHC000252-MLBCHC000264,  
 10 MLBCHC000419-MLBCHC000420, MLBCHC000762, MLBCHC000963-MLBCHC000980,  
 11 MLBCHC001134-MLBCHC001135, MLBCHC001143, MLBCHC001333-MLBCHC001350,  
 12 MLBCHC001504-MLBCHC001505, MLBCHC0003568, MLBCHC0003774-  
 13 MLBCHC0003791, MLBCHC0003947-MLBCHC0003948, MLBCHC0003960,  
 14 MLBCHC0004163-MLBCHC0004180, MLBCHC0004337-MLBCHC0004338,  
 15 MLBCHC0003192, MLBCHC0003388-MLBCHC0003407, MLBCHC0003565-  
 16 MLBCHC0003566, MLBCHC0002783, MLBCHC0003006-MLBCHC0003026,  
 17 MLBCHC0003188-MLBCHC0003189, MLBCHC0002395, MLBCHC0002594-  
 18 MLBCHC0002615 and MLBCHC0002778-MLBCHC0002779.

19 11. Attached hereto as **Exhibit 8** is a true and correct copy of the relevant excerpts of  
 20 Chicago White Sox Media Guides, bearing Bates Numbers MLBCWS0001999,  
 21 MLBCWS0002280, MLBCWS0002342, MLBCWS0002671, MLBCWS0002935,  
 22 MLBCWS0002996, MLBCWS0000341, MLBCWS0000621, MLBCWS0000684,  
 23 MLBCWS0000741, MLBCWS0001026, MLBCWS0001094, MLBCWS0001603,  
 24 MLBCWS0001892, MLBCWS0001958-MLBCWS0001959, MLBCWS0004679,  
 25 MLBCWS0004978, MLBCWS0005044-MLBCWS0005045, MLBCWS0005067,  
 26 MLBCWS0005364-MLBCWS0005365, MLBCWS0005440-MLBCWS0005441,  
 27 MLBCWS0004291, MLBCWS0004588, MLBCWS0004664-MLBCWS0004665,  
 28

MLBCWS0003913, MLBCWS0004201, MLBCWS0004275-MLBCWS0004276,  
MLBCWS0003529, MLBCWS0003835- MLBCWS0003839 and MLBCWS0003900.

12. Attached hereto as **Exhibit 9** is a true and correct copy of the relevant excerpts of Cincinnati Reds Media Guides, bearing Bates Numbers MLBCIN001455, MLBCIN001637, MLBCIN001904, MLBCIN000987, MLBCIN001170, MLBCIN001439, MLBCIN000041, MLBCIN000217, MLBCIN000486, MLBCIN000501, MLBCIN000695, MLBCIN000970, MLBCIN001923, MLBCIN002131, MLBCIN002396, MLBCIN0004021, MLBCIN0004202, MLBCIN0004475, MLBCIN0004491, MLBCIN0004699, MLBCIN0004984, MLBCIN0003515, MLBCIN0003714, MLBCIN0003993, MLBCIN0002969, MLBCIN0003197, MLBCIN0003409, MLBCIN0002412, MLBCIN0002657 and MLBCIN0002937.

13. Attached hereto as **Exhibit 10** is a true and correct copy of the relevant excerpts of Cleveland Indians Media Guides, bearing Bates Numbers MLBCLE0000037, MLBCLE0000259-MLBCLE0000260, MLBCLE0000336-MLBCLE0000341, MLBCLE0000494, MLBCLE0000610, MLBCLE0000845-MLBCLE0000846, MLBCLE0000924-MLBCLE0000929, MLBCLE0001081, MLBCLE0002268, MLBCLE0002481-MLBCLE0002482, MLBCLE0002561-MLBCLE0002566, MLBCLE0002707, MLBCLE0001684, MLBCLE0001905-MLBCLE0001906, MLBCLE0002125, MLBCLE0001104, MLBCLE0001319-MLBCLE0001320, MLBCLE0001545, MLBCLE0004545, MLBCLE0004757-MLBCLE0004758, MLBCLE0004975, MLBCLE0004990, MLBCLE0005217-MLBCLE0005218, MLBCLE0005294-MLBCLE0005299, MLBCLE0005435, MLBCLE0004082, MLBCLE0004309-MLBCLE0004310, MLBCLE0004529, MLBCLE0003663, MLBCLE0004839-MLBCLE0004844, MLBCLE0003878- MLBCLE0004879, MLBCLE0004073, MLBCLE0003195, MLBCLE0003391-MLBCLE0003392 and MLBCLE0003572.

14. Attached hereto as **Exhibit 11** is a true and correct copy of the relevant excerpts of Colorado Rockies Media Guides, bearing Bates Numbers MLBCOL000124,

MLBCOL000452, MLBCOL000455, MLBCOL000458, MLBCOL000461, MLBCOL000464,  
 MLBCOL000467, MLBCOL000470, MLBCOL000530, MLBCOL000541, MLBCOL000826,  
 MLBCOL000829, MLBCOL000832, MLBCOL000835, MLBCOL000838, MLBCOL000841,  
 MLBCOL000844, MLBCOL000900, MLBCOL000910, MLBCOL001189-MLBCOL001190,  
 MLBCOL001192, MLBCOL001194, MLBCOL001196, MLBCOL001198, MLBCOL001200,  
 MLBCOL001260, MLBCOL001270, MLBCOL001531-MLBCOL001532, MLBCOL001534,  
 MLBCOL001536, MLBCOL001538, MLBCOL0001540, MLBCOL001542, MLBCOL001597,  
 MLBCOL001607, MLBCOL001877-MLBCOL001878, MLBCOL001880, MLBCOL001882,  
 MLBCOL001884, MLBCOL001886, MLBCOL001888, MLBCOL001945, MLBCOL003581,  
 MLBCOL003899, MLBCOL003900, MLBCOL003902, MLBCOL003904, MLBCOL003906,  
 MLBCOL003908, MLBCOL003910, MLBCOL003960, MLBCOL003977, MLBCOL004281-  
 MLBCOL004282, MLBCOL004284, MLBCOL004286, MLBCOL004288, MLBCOL004290,  
 MLBCOL004292, MLBCOL004350, MLBCOL003179, MLBCOL003484, MLBCOL003492-  
 MLBCOL003497, MLBCOL003568, MLBCOL002755, MLBCOL003092, MLBCOL003100-  
 MLBCOL003105, MLBCOL003166, MLBCOL002391, MLBCOL002665, MLBCOL002673-  
 MLBCOL002678 and MLBCOL002745.

15. Attached hereto as **Exhibit 12** is a true and correct copy of the relevant excerpts  
 of Detroit Tigers Media Guides, bearing Bates Numbers MLBDET002780-MLBDET002781,  
 MLBDET002862-MLBDET002863, MLBDET001921, MLBDET002270-MLBDET002271,  
 MLBDET002360-MLBDET002363, MLBDET001437, MLBDET001798-MLBDET001799,  
 MLBDET001884-MLBDET001887, MLBDET003036, MLBDET003411-MLBDET003412,  
 MLBDET003503-MLBDET003506, MLBDET000711, MLBDET001082-MLBDET001083,  
 MLBDET001168-MLBDET001171, MLBDET000187, MLBDET000606-MLBDET000607,  
 MLBDET000690-MLBDET000693, MLBDET0004685, MLBDET0005095-MLBDET0005096,  
 MLBDET0005189-MLBDET0005192, MLBDET0005203, MLBDET0005656-  
 MLBDET005657, MLBDET0005750-MLBDET0005753, MLBDET0004235,  
 MLBDET0004592-MLBDET0004593, MLBDET0004670-MLBDET0004672,



MLBDET0003791, MLBDET0004144-MLBDET0004145, MLBDET0004220-  
MLBDET0004222, MLBDET0003547 and MLBDET0003742-MLBDET0003743.

16. Attached hereto as **Exhibit 13** is a true and correct copy of the relevant excerpts of Houston Astros Media Guides, bearing Bates Numbers HOU0001663, HOU0002068, HOU0002129, HOU0002473, HOU0002536, MLBHOU002401, MLBHOU002732, MLBHOU002800, MLBHOU000422, MLBHOU000495, MLBHOU002143, MLBHOU2376, MLBHOU000518, MLBHOU000711, MLBHOU000946, MLBHOU001468, MLBHOU001677, MLBHOU001926, MLBHOU000978, MLBHOU001201, MLBHOU001443, MLBHOU0004276, MLBHOU0004519, MLBHOU0004531, MLBHOU0004536, MLBHOU0004541, MLBHOU0004546, MLBHOU0004551, MLBHOU0004556, MLBHOU0004552-MLBHOU0004555, MLBHOU0004755, MLBHOU0004782, MLBHOU0005029, MLBHOU0005041, MLBHOU0005046, MLBHOU0005051, MLBHOU0005056, MLBHOU0005060, MLBHOU0005064, MLBHOU0005061-MLBHOU0005063, MLBHOU0005263, MLBHOU0003770, MLBHOU0004023, MLBHOU0004245, MLBHOU0004034, MLBHOU0004044, MLBHOU0003296, MLBHOU0003539, MLBHOU0003743, MLBHOU0002822, MLBHOU0003065 and MLBHOU0003269.

17. Attached hereto as **Exhibit 14** is a true and correct copy of the relevant excerpts of Kansas City Royals Media Guides, bearing Bates Numbers MLBKAN000791, MLBKAN000793, MLBKAN000795, MLBKAN000797, MLBKAN000799, MLBKAN000801, MLBKAN000803, MLBKAN000859-MLBKAN000860, MLBKAN002066, MLBKAN002068, MLBKAN002070, MLBKAN002072, MLBKAN002074, MLBKAN002076, MLBKAN002078, MLBKAN002142-MLBKAN002143, MLNKAN001731-MLBKAN001732, MLBKAN001737-MLBKAN001739, MLBKAN001741, MLBKAN001743, MLBKAN001745, MLBKAN001747, MLBKAN001749, MLBKAN001809-MLBKAN001810, MLBKAN001038, MLBKAN001320-MLBKAN001322, MLBKAN001324-MLBKAN001331, MLBKAN001392-MLBKAN001393, MLBKAN000082, MLBKAN000398-MLBKAN000400, MLBKAN000402-MLBKAN000408, MLBKAN000410-MLBKAN000411, MLBKAN000471-MLBKAN000472,



MLBKAN0003593, MLBKAN003931- MLBKAN003933, MLBKAN003935-  
 MLBKAN003941, MLBKAN003943, MLBKAN003944, MLBKAN004002-  
 MLBKAN004003, MLBKAN004007, MLNKAN0004337- MLBKAN0004338,  
 MLBKAN004343- MLBKAN004351, MLBKAN004353, MLBKAN004355-  
 MLBKAN004356, MLBKAN004417-MLBKAN004418, MLBKAN003182, MLBKAN003510-  
 MLBKAN003518, MLBKAN003520, MLBKAN003522-MLBKAN003523, MLBKAN003588-  
 MLBKAN003589, MLBKAN002753, MLBKAN003095-MLBKAN003108, MLBKAN003177-  
 MLBKAN003178, MLBKAN002317, MLBKAN002662-MLBKAN002674 and  
 MLBKAN002746-MLBKAN002747.

18. Attached hereto as **Exhibit 15** is a true and correct copy of the relevant excerpts  
 of Los Angeles Angels Media Guides, bearing Bates Numbers MBLAA000727,  
 MBLAA000894-MLBLAA000895, MBLAA001173-MLBLAA001174, MBLAA001337,  
 MBLAA001516-MLBLAA001517, MBLAA001795, MBLAA001802, MBLAA001987-  
 MBLAA001988, MBLAA002259, MBLAA000251, MBLAA000448-MLBLAA000449,  
 MBLAA000718, MBLAA002282, MBLAA002487-MLBLAA002488, MBLAA002761,  
 MBLAA0004430, MBLAA0004645-MLBLAA0004646, MBLAA0004923,  
 MBLAA0004932, MBLAA0005147-MLBLAA0005148, MBLAA0005433, MBLAA00  
 3916, MBLAA0004141-MLBLAA0004142, MBLAA0004423, MBLAA0003390,  
 MBLAA0003619-MLBLAA0003620, MBLAA0003907, MBLAA0002890,  
 MBLAA0003109-MLBLAA0003110 and MBLAA0003381.

19. Attached hereto as **Exhibit 16** is a true and correct copy of the relevant excerpts  
 of Los Angeles Dodgers Media Guides, bearing Bates Numbers MBLAD002062,  
 MBLAD002405-MLBLAD002407, MBLAD002434-MLBLAD002439, MBLAD003432-  
 MBLAD003434, MBLAD003462-MLBLAD003467, MBLAD000827, MBLAD001191-  
 MBLAD001193, MBLAD001207-MLBLAD001212, MBLAD001480, MBLAD001878-  
 MBLAD001880, MBLAD001896, MBLAD001898, MBLAD001900, MBLAD001902,  
 MBLAD001904, MBLAD001906, MBLAD002538, MBLAD002930-MLBLAD002932,  
 MBLAD002948, MBLAD002950, MBLAD002952, MBLAD002954, MBLAD002956,

1 MBLAD002958, MBLAD000208, MBLAD000588, MBLAD000606-MBLAD000611,  
 2 MBLAD004500, MBLAD004825-MBLAD004826, MBLAD004836-MBLAD004838,  
 3 MBLAD004916, MBLAD005172, MBLAD005175, MBLAD004208, MBLAD004472,  
 4 MBLAD004475, MBLAD003904, MBLAD004175, MBLAD004186, MBLAD003585,  
 5 MBLAD003794 and MBLAD003797.

6 20. Attached hereto as **Exhibit 17** is a true and correct copy of the relevant excerpts  
 7 of Miami Marlins Media Guides, bearing Bates Numbers MLBMIA000563, MLBMIA000794-  
 8 MLBMIA000805, MLBMIA000895, MLBMIA002655, MLBMIA002900-MLBMIA002911,  
 9 MLBMIA003004, MLBMIA000906, MLBMIA001195-MLBMIA001206, MLBMIA001310,  
 10 MLBMIA000123, MLBMIA000434-MLBMIA000445, MLBMIA000555, MLBMIA002215,  
 11 MLBMIA002532-MLBMIA002542, MLBMIA002647-MLBMIA002648, MLBMIA001373,  
 12 MLBMIA001716-MLBMIA001727, MLBMIA001834, MLBMIA0004144, MLBMIA0004491-  
 13 MLBMIA004502, MLBMIA0004505-MLBMIA0004506, MLBMIA004613, MLBMIA004620,  
 14 MLBMIA004979-MLBMIA004980, MLBMIA0004995-MLBMIA0004996, MLBMIA005095,  
 15 MLBMIA003705, MLBMIA004018-MLBMIA004019, MLBMIA004128, MLBMIA003325,  
 16 MLBMIA003616-MLBMIA003617, MLBMIA003700, MLBMIA003076, MLBMIA003278-  
 17 MLBMIA003289 and MLBMIA003320.

18 21. Attached hereto as **Exhibit 18** is a true and correct copy of the relevant excerpts  
 19 of Milwaukee Brewers Media Guides, bearing Bates Numbers MLBMIL001093,  
 20 MLBMIL001266, MLBMIL001268, MLBMIL001270, MLBMIL001272, MLBMIL001274,  
 21 MLBMIL001276, MLBMIL001278, MLBMIL001436- MLBMIL001437, MLBMIL000671,  
 22 MLBMIL000854, MLBMIL000856, MLBMIL000858, MLBMIL000860, MLBMIL000862,  
 23 MLBMIL000864, MLBMIL000866, MLBMIL001032-MLBMIL001033, MLBMIL000121,  
 24 MLBMIL000306, MLBMIL000308, MLBMIL000310, MLBMIL000312, MLBMIL000314,  
 25 MLBMIL000316, MLBMIL000318, MLBMIL000466-MLBMIL000468, MLBMIL001439,  
 26 MLBMIL0001633, MLBMIL001635, MLBMIL001637, MLBMIL001639, MLBMIL001641,  
 27 MLBMIL001643, MLBMIL001645, MLBMIL001795-MLBMIL001797, MLBMIL001834,  
 28 MLBMIL002021, MLBMIL002023, MLBMIL002025, MLBMIL002027, MLBMIL002029,

MLBMIL002031, MLBMIL002033, MLBMIL002185-MLBMIL002187, MLBMIL003420, MLBMIL003597, MLBMIL003599, MLBMIL003601, MLBMIL003603, MLBMIL003605, MLBMIL003607, MLBMIL003609, MLBMIL003763-MLBMIL003765, MLBMIL003768, MLBMIL003956, MLBMIL003958, MLBMIL003960, MLBMIL003962, MLBMIL003964, MLBMIL003966, MLBMIL003968, MLBMIL004130-MLBMIL004132, MLBMIL003040, MLBMIL003239, MLBMIL003241, MLBMIL003243-MLBMIL003245, MLBMIL003247, MLBMIL003249, MLBMIL003251, MLBMIL003253, MLBMIL003255, MLBMIL003413-MLBMIL003415, MLBMIL003644, MLBMIL002851, MLBMIL002853, MLBMIL002855, MLBMIL0022857, MLBMIL002859, MLBMIL002861, MLBMIL002863, MLBMIL002865, MLBMIL002867, MLBMIL003033-MLBMIL003035, MLBMIL002256, MLBMIL002455-MLBMIL002463 and MLBMIL002639-MLBMIL002640.

22. Attached hereto as **Exhibit 19** is a true and correct copy of the relevant excerpts of Minnesota Twins Media Guides, bearing Bates Numbers MLBMIN000527, MLBMIN000840-MLBMIN000852, MLBMIN000928, MLBMIN000931, MLBMIN000069, MLBMIN000406-MLBMIN000418, MLBMIN000493, MLBMIN000496, MLBMIN0001794, MLBMIN002110-MLBMIN002123, MLBMIN002209, MLBMIN002212, MLBMIN001375, MLBMIN001689-MLBMIN001702, MLBMIN001784, MLBMIN001787, MLBMIN000937, MLBMIN001251-MLBMIN001264, MLBMIN001365, MLBMIN001368, MIN0010174, MIN0010493-MIN0010506, MIN0010607, MIN0010610, MLBMIN0004058, MLBMIN0004371-MLBMIN0004385, MLBMIN0004492, MLBMIN0004497, MLBMIN0003163, MLBMIN0003485-MLBMIN0003499, MLBMIN0003604, MLBMIN0003609, MLBMIN0002716, MLBMIN0003032-MLBMIN0003046, MLBMIN0003153, MLBMIN0003157, MLBMIN0002231, MLBMIN0002583-MLBMIN0002597, MLBMIN002706 and MLBMIN002710.

23. Attached hereto as **Exhibit 20** is a true and correct copy of the relevant excerpts of New York Mets Media Guides, bearing Bates Numbers MLBNYM000107, MLBNYM000375-MLBNYM000402, MLBNYM000655, MLBNYM002349, MLBNYM002591-MLBNYM002616, MLBNYM002903, MLBNYM000671,

1 MLBNYM000921-MLBNYM000950, MLBNYM001223, MLBNYM001749,  
 2 MLBNYM002024-MLBNYM002053, MLBNYM002335, MLBNYM002966,  
 3 MLBNYM003207-MLBNYM003239, MLBNYM003498, MLBNYM004564,  
 4 MLBNYM004810-MLBNYM004838, MLBNYM005099, MLBNYM005112,  
 5 MLBNYM005332-MLBNYM005351, MLBNYM005595, MLBNYM004043,  
 6 MLBNYM004296-MLBNYM004312, MLBNYM004552, MLBNYM003515,  
 7 MLBNYM003767-MLBNYM003785 and MLBNYM004032.

8 24. Attached hereto as **Exhibit 21** is a true and correct copy of the relevant excerpts  
 9 of New York Yankees Media Guides, bearing Bates Numbers MLBNYY000119,  
 10 MLBNYY000505-MLBNYY000519, MLBNYY000572, MLBNYY002350, MLBNYY002776-  
 11 MLBNYY002790, MLBNYY002851, MLBNYY001808, MLBNYY002236-MLBNYY002254,  
 12 MLBNYY002314, MLBNYY000803, MLBNYY001211-MLBNYY001230, MLBNYY001293,  
 13 MLBNYY001349, MLBNYY001708-MLBNYY001719, MLBNYY001784, MLBNYY004394,  
 14 MLBNYY004772-MLBNYY004783, MLBNYY004854, MLBNYY004859, MLBNYY005233-  
 15 MLBNYY005244, MLBNYY005316, MLBNYY003921, MLBNYY004303-MLBNYY004314,  
 16 MLBNYY004388, MLBNYY003440, MLBNYY003846, MLBNYY003848-  
 17 MLBNYY0003857, MLBNYY003915, MLBNYY002959, MLBNYY003365,  
 18 MLBNYY003367-MLBNYY003376 and MLBNYY003434.

19 25. Attached hereto as **Exhibit 22** is a true and correct copy of the relevant excerpts  
 20 of Oakland Athletics Media Guides, bearing Bates Numbers MLBOAK000052,  
 21 MLBOAK000476-MLBOAK000496, MLBOAK000547, MLBOAK000553, MLBOAK001136-  
 22 MLBOAK001147, MLBOAK001209, MLBOAK001215, MLBOAK001820-  
 23 MLBOAK001830, MLBOAK001893-MLBOAK001894, MLBOAK001899, MLBOAK002516-  
 24 MLBOAK002526, MLBOAK002589-MLBOAK002590, MLBOAK002595, MLBOAK003180-  
 25 MLBOAK003190, MLBOAK003251, MLBOAK005693, MLBOAK006274-MLBOAK006287,  
 26 MLBOAK006345, MLBOAK006351, MLBOAK006992-MLBOAK007006, MLBOAK007065,  
 27 MLBOAK005063, MLBOAK005613-MLBOAK005628, MLBOAK005690, MLBOAK004357,  
 28

1 MLBOAK004979-MLBOAK004998, MLBOAK005060, MLBOAK003705, MLBOAK004265-  
2 MLBOAK004285 and MLBOAK004354.

3 26. Attached hereto as **Exhibit 23** is a true and correct copy of the relevant excerpts  
4 of Philadelphia Phillies Media Guides, bearing Bates Numbers MLBPHI0001650,  
5 MLBPHI0001956-MLBPHI0001963, MLBPHI0002034, MLBPHI0001257, MLBPHI0001567-  
6 MLBPHI0001574, MLBPHI0001649, MLBPHI0002035, MLBPHI0002351-MLBPHI0002358,  
7 MLBPHI0002435, MLBPHI0002523, MLBPHI0002831-MLBPHI0002838, MLBPHI0002919,  
8 MLBPHI0000439, MLBPHI0000741-MLBPHI0000748, MLBPHI0000823, MLBPHI0004282,  
9 MLBPHI0004580-MLBPHI0004587, MLBPHI0004666-MLBPHI0004667, MLBPHI0004965-  
10 MLBPHI0004972, MLBPHI0005051, MLBPHI0003895, MLBPHI0004187-MLBPHI0004196,  
11 MLBPHI0004281, MLBPHI0003458, MLBPHI0003786- MLBPHI0003795, MLBPHI0003894,  
12 MLBPHI0003003, MLBPHI0003350-MLBPHI0003359 and MLBPHI0003456.

13 27. Attached hereto as **Exhibit 24** is a true and correct copy of the relevant excerpts  
14 of Pittsburgh Pirates Media Guides, bearing Bates Numbers MLBPIT002115, MLBPIT002420-  
15 MLBPIT002433, MLBPIT002436-MLBPIT002437, MLBPIT001664, MLBPIT001965-  
16 MLBPIT001978, MLBPIT001981-MLBPIT001982, MLBPIT000964, MLBPIT001253-  
17 MLBPIT001266, MLBPIT001295-MLBPIT001296, MLBPIT001312, MLBPIT001603-  
18 MLBPIT001618, MLBPIT001647-MLBPIT001648, MLBPIT000021, MLBPIT000219-  
19 MLBPIT000228, MLBPIT000267-MLBPIT000268, MLBPIT003578, MLBPIT003771-  
20 MLBPIT003780, MLBPIT003815-MLBPIT002816, MLBPIT003922, MLBPIT004115-  
21 MLBPIT004124, MLBPIT004159-MLBPIT004160, MLBPIT003224, MLBPIT003417-  
22 MLBPIT003426, MLBPIT003465-MLBPIT003466, MLBPIT002863, MLBPIT003062-  
23 MLBPIT003072, MLBPIT003112-MLBPIT003113, MLBPIT002496, MLBPIT002702-  
24 MLBPIT002710 and MLBPIT002748-MLBPIT002749.

25 28. Attached hereto as **Exhibit 25** is a true and correct copy of the relevant excerpts  
26 of San Diego Padres Media Guides, bearing Bates Numbers MLBSDP000985,  
27 MLBSDP001267-MLBSDP001287, MLBSDP001343-MLBSDP001344, MLBSDP001764,  
28 MLBSDP002022-MLBSDP002043, MLBSDP002102-MLBSDP002103, MLBSDP000418,

1 MLBSDP000710-MLBSDP000731, MLBSDP000795, MLBSDP000079, MLBSDP000335-  
 2 MLBSDP000358, MLBSDP000415, MLBSDP001440, MLBSDP001689-MLBSDP001711,  
 3 MLBSDP001761, MLBSDP003298, MLBSDP003547-MLBSDP003566, MLBSDP003619,  
 4 MLBSDP0003622, MLBSDP003884-MLBSDP003907, MLBSDP003959, MLBSDP002970,  
 5 MLBSDP003229-MLBSDP003244, MLBSDP003293-MLBSDP003294, MLBSDP002642,  
 6 MLBSDP002901-MLBSDP002916, MLBSDP002965-MLBSDP002966, MLBSDP002254 and  
 7 MLBSDP002565-MLBSDP002574.

8 29. Attached hereto as **Exhibit 26** is a true and correct copy of the relevant excerpts  
 9 of San Francisco Giants Media Guides, bearing Bates Numbers MLBSFG002628,  
 10 MLBSFG003060-MLBSFG003061, MLBSFG003065-MLBSFG003078, MLBSFG003131,  
 11 MLBSFG000171, MLBSFG000599-MLBSFG000600, MLBSFG000603-MLBSFG000616,  
 12 MLBSFG000670, MLBSFG000708, MLBSFG001091-MLBSFG001092, MLBSFG001096-  
 13 MLBSFG001110, MLBSFG001162, MLBSFG001224, MLBSFG001602-MLBSFG001603,  
 14 MLBSFG001606-MLBSFG001619, MLBSFG001677, MLBSFG002106, MLBSFG002542-  
 15 MLBSFG002543, MLBSFG002546-MLBSFG002558, MLBSFG002609, MLBSFG004757,  
 16 MLBSFG005162, MLBSFG005164-MLBSFG005176, MLBSFG005224, MLBSFG005245,  
 17 MLBSFG005676, MLBSFG005678-MLBSFG005691, MLBSFG005738, MLBSFG004249,  
 18 MLBSFG004678, MLBSFG004680-MLBSFG004695, MLBSFG004728, MLBSFG003717,  
 19 MLBSFG004142, MLBSFG004163, MLBSFG004164-MLBSFG004172, MLBSFG004230,  
 20 MLBSFG003169, MLBSFG003605, MLBSFG003626- MLBSFG003637 and MLBSFG003701.

21 30. Attached hereto as **Exhibit 27** is a true and correct copy of the relevant excerpts  
 22 of Seattle Mariners Media Guides, bearing Bates Numbers MLBSEA000993, MLBSEA001257,  
 23 MLBSEA001275-MLBSEA001287, MLBSEA001381, MLBSEA001895, MLBSEA002114,  
 24 MLBSEA002129-MLBSEA002141, MLBSEA002240, MLBSEA000061, MLBSEA000268,  
 25 MLBSEA000285-MLBSEA000298, MLBSEA000388, MLBSEA000423, MLBSEA000646,  
 26 MLBSEA000663-MLBSEA000673, MLBSEA000764, MLBSEA001517, MLBSEA001742,  
 27 MLBSEA001758-MLBSEA001769, MLBSEA001866, MLBSEA003285, MLBSEA003506,  
 28 MLBSEA003520-MLBSEA003531, MLBSEA003620, MLBSEA003640, MLBSEA003869,

1 MLBSEA003889-MLBSEA003902, MLBSEA003981, MLBSEA002961, MLBSEA003180,  
 2 MLBSEA003195-MLBSEA003203, MLBSEA003270, MLBSEA002635, MLBSEA002856,  
 3 MLBSEA002871-MLBSEA002879, MLBSEA002946, MLBSEA002304, MLBSEA002532,  
 4 MLBSEA002546-MLBSEA002554 and MLBSEA002620.

5 31. Attached hereto as **Exhibit 28** is a true and correct copy of the relevant excerpts  
 6 of St. Louis Cardinals Media Guides, bearing Bates Numbers MLBSTL000340,  
 7 MLBSTL000434-MLBSTL000442, MLBSTL000473-MLBSTL000477, MLBSTL001033,  
 8 MLBSTL001141-MLBSTL001149, MLBSTL001180-MLBSTL001184, MLBSTL000111,  
 9 MLBSTL000223-MLBSTL000230, MLBSTL000261-MLBSTL000265, MLBSTL000522,  
 10 MLBSTL000732-MLBSTL000747, MLBSTL000803-MLBSTL000810, MLBSTL001649,  
 11 MLBSTL001854-MLBSTL001869, MLBSTL001929-MLBSTL001936, MLBSTL001229,  
 12 MLBSTL001450-MLBSTL001465, MLBSTL001529-MLBSTL001536, MLBSTL003904,  
 13 MLBSTL004129-MLBSTL004143, MLBSTL004209-MLBSTL004216, MLBSTL004316,  
 14 MLBSTL004568-MLBSTL004582, MLBSTL004651-MLBSTL004658, MLBSTL003435,  
 15 MLBSTL003701-MLBSTL003718, MLBSTL003788-MLBSTL003795, MLBSTL002880,  
 16 MLBSTL003212-MLBSTL003229, MLBSTL003298-MLBSTL003304, MLBSTL002300,  
 17 MLBSTL002657-MLBSTL002674 and MLBSTL002741-MLBSTL002747.

18 32. Attached hereto as **Exhibit 29** is a true and correct copy of the relevant excerpts  
 19 of Tampa Bay Rays Media Guides, bearing Bates Numbers MLBTBR0002139,  
 20 MLBTBR0002448, MLBTBR0002454-MLBTBR0002473, MLBTBR0002542-  
 21 MLBTBR0002543, MLBTBR0003830, MLBTBR0004155, MLBTBR0004161-  
 22 MLBTBR0004181, MLBTBR0004258-MLBTBR0004259, MLBTBR0003067,  
 23 MLBTBR0003409, MLBTBR0003415-MLBTBR0003437, MLBTBR0003516-  
 24 MLBTBR0003517, MLBTBR0000958, MLBTBR0001316, MLBTBR0001323-  
 25 MLBTBR0001345, MLBTBR0001429-MLBTBR0001430, MLBTBR0001451,  
 26 MLBTBR0001770, MLBTBR0001777-MLBTBR0001801, MLBTBR0001842-  
 27 MLBTBR0001843, MLB0032680, MLB0032987-MLB0032997, MLB0033075-MLB0033076,  
 28 MLB0033084, MLB0033392- MLB0033403, MLB0033483- MLB0033484, MLB0032260,



1 MLB0032579-MLB0032590, MLB0032672-MLB0032673, MLB0031832, MLB0032155-  
 2 MLB0032166, MLB0032252-MLB0032253, MLB0031396, MLB0031728-MLB0031738 and  
 3 MLB0031827-MLB0031828.

4 33. Attached hereto as **Exhibit 30** is a true and correct copy of the relevant excerpts  
 5 of Texas Rangers Media Guides, bearing Bates Numbers TEX0000411, TEX0000710-  
 6 TEX0000723, TEX0000796, TEX0000803, TEX0001118-TEX0001135, TEX0001202,  
 7 MLBTEX000449, MLBTEX000756-MLBTEX000779, MLBTEX000850-MLBTEX000851,  
 8 MLBTEX000037, MLBTEX000351-MLBTEX000375, MLBTEX000446-MLBTEX000447,  
 9 MLBTEX001480, MLBTEX001803-MLBTEX001828, MLBTEX001898-MLBTEX001899,  
 10 MLBTEX002069, MLBTEX002393-MLBTEX002415, MLBTEX002486-MLBTEX002487,  
 11 MLBTEX001072, MLBTEX001367-MLBTEX001387, MLBTEX001393-MLBTEX001394,  
 12 MLBTEX001461-MLBTEX001462, MLBTEX003705, MLBTEX003997-MLBTEX004017,  
 13 MLBTEX004022-MLBTEX004023, MLBTEX004094-MLBTEX004095, MLBTEX004101,  
 14 MLBTEX004419-MLBTEX004439, MLBTEX004444-MLBTEX004445, MLBTEX004514-  
 15 MLBTEX004515, MLBTEX003305, MLBTEX003609-MLBTEX003629, MLBTEX003632-  
 16 MLBTEX003633, MLBTEX003702-MLBTEX003703, MLBTEX002905, MLBTEX003196,  
 17 MLBTEX003208-MLBTEX003227, MLBTEX003230-MLBTEX003231, MLBTEX003296-  
 18 MLBTEX003297, MLBTEX002505, MLBTEX002800, MLBTEX002814-MLBTEX0028830,  
 19 MLBTEX002834-MLBTEX002835 and MLBTEX002902-MLBTEX002903.

20 34. Attached hereto as **Exhibit 31** is a true and correct copy of the relevant excerpts  
 21 of Toronto Blue Jays Media Guides, bearing Bates Numbers MLBTOR001842,  
 22 MLBTOR002197-MLBTOR002198, MLBTOR002274, MLBTOR002350, MLBTOR002701-  
 23 MLBTOR002702, MLBTOR002749-MLBTOR002750, MLBTOR002778, MLBTOR002784,  
 24 MLBTOR003139-MLBTOR003154, MLBTOR003191-MLBTOR003192, MLBTOR003216,  
 25 MLBTOR001364, MLBTOR001752-MLBTOR001768, MLBTOR001805-MLBTOR001806,  
 26 MLBTOR001825, MLBTOR000910, MLBTOR001276-MLBTOR001292, MLBTOR001325-  
 27 MLBTOR001326, MLBTOR001343, MLBTOR000154, MLBTOR000486-MLBTOR000502,  
 28 MLBTOR000533-MLBTOR000534, MLBTOR000551, MLBTOR004364, MLBTOR004721-

MLBTOR004730, MLBTOR004735-MLBTOR004736, MLBTOR004750, MLBTOR004764, MLBTOR005098-MLBTOR005107, MLBTOR005112-MLBTOR005113, MLBTOR005126, MLBTOR003980, MLBTOR004327-MLBTOR004336, MLBTOR004355, MLBTOR003608, MLBTOR003943-MLBTOR003952, MLBTOR003971, MLBTOR003224, MLBTOR003571-MLBTOR003580 and MLBTOR003599.

35. Attached hereto as **Exhibit 32** is a true and correct copy of the relevant excerpts of Washington Nationals Media Guides, bearing Bates Numbers MLBWAS0001546, MLBWAS0001827-MLBWAS0001831, MLBWAS0000508, MLBWAS0000774-MLBWAS0000778, MLBWAS0001375, MLBWAS0001518-MLBWAS0001520, MLBWAS0001889, MLBWAS0002188-MLBWAS0002192, MLBWAS0000831, MLBWAS0001183-MLBWAS0001187, MLBWAS0003497, MLBWAS0003870-MLBWAS0003874, MLBWAS0003933, MLBWAS0004324-MLBWAS0004328, MLBWAS0003061, MLBWAS0003440-MLBWAS0003444, MLBWAS0002661, MLBWAS0003002-MLBWAS0003006, MLBWAS0002247 and MLBWAS0002599-MLBWAS0002603.

36. Attached hereto as **Exhibit 33** are true and correct copies of championship season game schedules for certain minor league affiliates of the Arizona Diamondbacks, bearing Bates Numbers ARI0060503-ARI0060526, ARI0060162-ARI0060198, ARI0069088-ARI0069092, ARI0069121-ARI0069126, ARI0069093-ARI0069101, ARI0069127-ARI0069135, ARI0060199-ARI0060210, ARI0069102-ARI0069110, ARI0069136, ARI0060211-ARI0060270, ARI0060527, ARI0069111, ARI0069137-ARI0069142, ARI0060271-ARI0060502, ARI0069112-ARI0069120 and ARI0069143-ARI0069151.

37. Attached hereto as **Exhibit 34** are true and correct copies of championship season game schedules for certain minor league affiliates of the Atlanta Braves, bearing Bates Numbers ATL0000368-ATL0000377, ATL0000418, ATL0000456-ATL0000460, ATL0000419-ATL0000428, ATL0000461-ATL0000470, ATL0000378-ATL0000382, ATL0000429-ATL0000437, ATL0000471-ATL0000479, ATL0000383-ATL0000407, ATL0000438-

1 ATL0000446, ATL0000480-ATL0000488, ATL0000408-ATL0000412, ATL0000447-  
2 ATL0000455 and ATL0000489-ATL0000497.

3 38. Attached hereto as **Exhibit 35** are true and correct copies of championship season  
4 game schedules for certain minor league affiliates of the Boston Red Sox, bearing Bates  
5 Numbers BOS0000201-BOS0000224, BOS0000342-BOS0000350, BOS0000375-BOS0000383,  
6 BOS0000225-BOS0000251, BOS0000351-BOS0000356, BOS0000384-BOS0000389,  
7 BOS0000252-BOS0000277, BOS0000390, BOS0000278-BOS0000302, BOS0000357-  
8 BOS0000365, BOS0000391-BOS0000399, BOS0000303-BOS0000327, BOS0000366-  
9 BOS0000374, BOS0000400-BOS0000409 and BOS0000333-BOS0000341.

10 39. Attached hereto as **Exhibit 36** are true and correct copies of championship season  
11 game schedules for certain minor league affiliates of the Chicago Cubs, bearing Bates Numbers  
12 CHC0029674-CHC0029806, CHC0031332-CHC0031337, CHC0031374-CHC0031378,  
13 CHC0029807-CHC0029867, CHC0031338-CHC0031346, CHC0031379-CHC0031387,  
14 CHC0029868-CHC0029904, CHC0031347-CHC0031355, CHC0031388, CHC0029905-  
15 CHC0029942, CHC0031356-CHC0031364, CHC0031389-CHC0031397, CHC0029943-  
16 CHC0030003, CHC0031365-CHC0031373 and CHC0031398- CHC0031406.

17 40. Attached hereto as **Exhibit 37** are true and correct copies of championship season  
18 game schedules for certain minor league affiliates of the Chicago White Sox, bearing Bates  
19 Numbers CWS0000547-CWS0000580, CWS0000690-CWS0000698, CWS0000728-  
20 CWS0000736, CWS0000581-CWS0000613, CWS0000699-CWS0000707, CWS0000737-  
21 CWS0000745, CWS0000614-CWS0000629, CWS0000708, CWS0000746- CWS0000751,  
22 CWS0000630-CWS0000662, CWS0000709- CWS0000718, CWS0000752-CWS0000760,  
23 CWS0000663- CWS0000683, CWS0000719-CWS0000727 and CWS0000761- CWS0000769.

24 41. Attached hereto as **Exhibit 38** are true and correct copies of championship season  
25 game schedules for certain minor league affiliates of the Cincinnati Reds, bearing Bates  
26 Numbers CIN0028906-CIN0028968, CIN0030938, CIN0030976-CIN0030981, CIN0028969-  
27 CIN0028980, CIN0030967-CIN0030975, CIN0030982-CIN0030990, CIN0028981-  
28 CIN0029026, CIN0030939-CIN0030947, CIN0030991-CIN0030999, CIN0029027-

1 CIN0029038, CIN0030948-CIN0030957, CIN0031000-CIN0031008, CIN0029039-  
 2 CIN0029098, CIN0030958-CIN0030966, CIN0031009-CIN0031017, CIN0029099-  
 3 CIN0029146 and CIN0030967-CIN0030975.

4 42. Attached hereto as **Exhibit 39** are true and correct copies of championship season  
 5 game schedules for certain minor league affiliates of the Cleveland Indians, bearing Bates  
 6 Numbers CLE0000321-CLE0000344, CLE0000448-CLE0000456, CLE0000491-CLE0000499,  
 7 CLE0000345-CLE0000394, CLE0000457-CLE0000465, CLE0000500-CLE0000508,  
 8 CLE0000395-CLE0000419, CLE0000466-CLE0000474, CLE0000509-CLE0000517,  
 9 CLE0000420-CLE0000424, CLE0000475-CLE0000484, CLE0000518- CLE0000526,  
 10 CLE0000425-CLE0000439, CLE0000485-CLE0000490 and CLE0000527-CLE0000532.

11 43. Attached hereto as **Exhibit 40** are true and correct copies of championship season  
 12 game schedules for certain minor league affiliates of the Colorado Rockies, bearing Bates  
 13 Numbers COL0059761-COL0059821, COL0060434-COL0060442, COL0060475-  
 14 COL0060483, COL0059822-COL0059834, COL0060443-COL0060447, COL0060484-  
 15 COL0060493, COL0048860, COL0059835-COL0059942, COL0059748-COL0059759,  
 16 COL0060027-COL0060043, COL0060448-COL0060456, COL0060494-COL0060502,  
 17 COL0059760, COL0060425-COL0060433, COL0060466-COL0060474, COL0060457-  
 18 COL0060465, COL0060503-COL0060511, COL0059943-COL0060014, COL0060140-  
 19 COL0060151, COL0060015-COL0060026, COL0048649 and COL0060044-COL0060139.

20 44. Attached hereto as **Exhibit 41** are true and correct copies of championship season  
 21 game schedules for certain minor league affiliates of the Detroit Tigers, bearing Bates Numbers  
 22 DET0018875-DET0018890, DET0019135-DET0019140, DET0019168- DET0019173,  
 23 DET0018891-DET0018927, DET0019141-DET0019149, DET0019174-DET0019182,  
 24 DET0018928-DET0019027, DET0019150-DET0019158, DET0019183-DET0019191,  
 25 DET0019028-DET0019048, DET0019159-DET0019167, and DET0019192-DET19200.

26 45. Attached hereto as **Exhibit 42** are true and correct copies of championship season  
 27 game schedules for certain minor league affiliates of the Houston Astros, bearing Bates Numbers  
 28 HOU0024583-HOU0024607, HOU0025712-HOU25720, HOU0025745-HOU0025753,

1 HOU0025702-HOU0025711, HOU0025754-HOU0025763, HOU0024608-HOU0024702,  
 2 HOU0025730-HOU0025738, HOU0025764-HOU0025772, HOU0025721-HOU0025729,  
 3 HOU0025773-HOU25781, HOU0024703-HOU0024726, HOU0025739-HOU0025744 and  
 4 HOU0025782-HOU0025787.

5 46. Attached hereto as **Exhibit 43** are true and correct copies of championship season  
 6 game schedules for certain minor league affiliates of the Kansas City Royals, bearing Bates  
 7 Numbers KAN0021659-KAN0021673, KAN0027472-KAN0027476, KAN0021674-  
 8 KAN0021688, KAN0027434, KAN0027477-KAN0027482, KAN0021689-KAN0021712,  
 9 KAN0027435-KAN0027444, KAN0027483-KAN0027491, KAN0021713-KAN0021736,  
 10 KAN0027445-KAN0027453, KAN0027492-KAN0027500, KAN0021737-KAN0021763,  
 11 KAN0027454-KAN0027462, KAN0027501-KAN0027509, KAN0021764-KAN0021787,  
 12 KAN0027463-KAN0027471 and KAN0027510-KAN0027519.

13 47. Attached hereto as **Exhibit 44** are true and correct copies of championship season  
 14 game schedules for certain minor league affiliates of the Los Angeles Angels, bearing Bates  
 15 Numbers LAA0024570-LAA0024803, LAA0026689-LAA0026697, LAA0026717-  
 16 LAA0026725, LAA0024604-LAA0024633, LAA0026698-LAA0026706, LAA0026726-  
 17 LAA0026734, LAA0026707, LAA0024634-LAA0024649, LAA0026735-LAA0026739,  
 18 LAA0024650-LAA0024674, LAA0026708-LAA0026716 and LAA0026740-LAA0026748.

19 48. Attached hereto as **Exhibit 45** are true and correct copies of championship season  
 20 game schedules for certain minor league affiliates of the Los Angeles Dodgers, bearing Bates  
 21 Numbers LAD0057284-LAD0057323, LAD0059312-LAD0059320, LAD0059348-  
 22 LAD0059356, LAD0057324-LAD0057327, LAD0057268-LAD0057283, LAD0057328-  
 23 LAD0057342, LAD0059357-LAD0059362, LAD0057343-LAD0057350, LAD0059321-  
 24 LAD0059329, LAD0059363-LAD0059371, LAD0057351-LAD0057374, LAD0059330-  
 25 LAD0059338, LAD0059372-LAD0059380, LAD0057375-LAD0057382, LAD0059339-  
 26 LAD0059347 and LAD0059381-LAD59390.

27 49. Attached hereto as **Exhibit 46** are true and correct copies of championship season  
 28 game schedules for certain minor league affiliates of the Miami Marlins, bearing Bates Numbers

1 MIA0047126-MIA0047134, MIA0053181-MIA0053185, MIA0053204-MIA0053217,  
 2 MIA0047135-MIA0047158, MIA0053186-MIA0053194, MIA0047159-MIA0047192,  
 3 MIA0053195-MIA0053203, MIA0053218-MIA0053226, MIA0047193-MIA0047264,  
 4 MIA0053180 and MIA0053227-MIA0053231.

5 50. Attached hereto as **Exhibit 47** are true and correct copies of championship season  
 6 game schedules for certain minor league affiliates of the Milwaukee Brewers, bearing Bates  
 7 Numbers MIL0015316-MIL0015319, MIL0007965, MIL0018967-MIL0018975, MIL0018994-  
 8 MIL0019002, MIL0015320-MIA0015351, MIL0018976-MIL0018984, MIL0019003-  
 9 MIL0019011, MIL0015352-MIL0015406, MIL0019012-MIL0019025, MIL0015407-  
 10 MIL0015422, MIL0018985-MIL0018993 and MIL0019026-MIL0019034.

11 51. Attached hereto as **Exhibit 48** are true and correct copies of championship season  
 12 game schedules for certain minor league affiliates of the Minnesota Twins, bearing Bates  
 13 Numbers MIN0017006-MIN0017029, MIN0017205-MIN0017213, MIN0017232-MIN0017240,  
 14 MIN0017030-MIN0017037, MIN0017214-MIN0017222, MIN0017038-MIN0017052,  
 15 MIN0017204, MIN0017241-MIN0017245, MIN0017053-MIN0017098, MIN0017246-  
 16 MIN0017254, MIN0017099-MIN0017134, MIN0017223-MIN0017231 and MIN0017255-  
 17 MIN0017263.

18 52. Attached hereto as **Exhibit 49** are true and correct copies of championship season  
 19 game schedules for certain minor league affiliates of the New York Mets, bearing Bates  
 20 Numbers NYM0015550-NYM0015645, NYM0016110, NYM0017002-NYM0017010,  
 21 NYM0017034-NYM0017042, NYM0015646-NYM00015669, NYM0017011-NYM0017015,  
 22 NYM0017043-NYM0017048, NYM0015670-NYM0015717, NYM0017016-NYM0017024,  
 23 NYM0017049-NYM0017057, NYM0015718-NYM0015789, NYM0017058-NYM0017062,  
 24 NYM0015790-NYM0015825, NYM0017025-NYM0017033, NYM0015826-NYM0015891 and  
 25 NYM0017063-NYM0017071.

26 53. Attached hereto as **Exhibit 50** are true and correct copies of championship season  
 27 game schedules for certain minor league affiliates of the New York Yankees, bearing Bates  
 28 Numbers NYY0011513-NYY0011573, NYY0016209-NYY0016217, NYY0016242-

1 NYY0016250, NYY0011574-NYY0011585, NYY0016218, NYY0016251-NYY0016255,  
 2 NYY0011586-NYY0011613, NYY0016219-NYY16227, NYY0016256-NYY0016264,  
 3 NYY0011614-NYY0011709, NYY0016228-NYY0016232, NYY0016265-NYY0016269,  
 4 NYY0011710-NYY0011808, NYY0016233-NYY0016241 and NYY0016270-NYY0016278.

5 54. Attached hereto as **Exhibit 51** are true and correct copies of championship season  
 6 game schedules for certain minor league affiliates of the Oakland Athletics, bearing Bates  
 7 Numbers OAK0008915-OAK0008929, OAK0009109-OAK0009117, OAK0009150-  
 8 OAK0009158, OAK0008930-OAK0008938, OAK0009159-OAK0009167, OAK0008939-  
 9 OAK0008961, OAK0009118-OAK0009126, OAK0009168-OAK0009176, OAK0008962-  
 10 OAK0008966, OAK0009127-OAK0009135, OAK0008967-OAK0009022, OAK0009136-  
 11 OAK0009144, OAK0009177-OAK0009185, OAK0009023-OAK0009037, OAK0009145-  
 12 OAK0009149 and OAK0009186-OAK0009190.

13 55. Attached hereto as **Exhibit 52** are true and correct copies of championship season  
 14 game schedules for certain minor league affiliates of the Philadelphia Phillies, bearing Bates  
 15 Numbers PHI0001292-PHI0001343, PHI0001428-PHI0001437, PHI0001461-PHI0001469,  
 16 PHI0001344-PHI0001368, PHI0001438-PHI0001446, PHI0001470-PHI0001478, PHI0001385-  
 17 PHI0001392, PHI0001369-PHI0001384, PHI0001447-PHI0001455, PHI0001479-PHI0001487,  
 18 PHI0001393-PHI0001419, PHI0001456-PHI0001460 and PHI0001488-PHI0001492.

19 56. Attached hereto as **Exhibit 53** are true and correct copies of championship season  
 20 game schedules for certain minor league affiliates of the Pittsburgh Pirates, bearing Bates  
 21 Numbers PIT0015529-PIT0015552, PIT0024334-PIT0024342, PIT0024366-PIT0024374,  
 22 PIT0015553-PIT0015592, PIT0024375-PIT0024388, PIT0015593-PIT0015616, PIT0024343-  
 23 PIT0024351, PIT0024389-PIT0024397, PIT0015617-PIT0015628, PIT0015632-PIT0015655,  
 24 PIT0024357-PIT0024365, PIT0015629-PIT0015631, PIT0024352-PIT0024356 and  
 25 PIT0024398-PIT0024402.

26 57. Attached hereto as **Exhibit 54** are true and correct copies of championship season  
 27 game schedules for certain minor league affiliates of the San Diego Padres, bearing Bates  
 28 Numbers SDP0013269-SDP0013277, SDP0005822-SDP0005857, SDP0013236-SDP0013244,



SDP0013278-SDP0013286, SDP0005858-SDP0005906, SDP0013245-SDP0013253,  
SDP0013287-SDP0013295, SDP0005907-SDP0005941, SDP0013254-SDP0013262,  
SDP0013296-SDP0013304, SDP0005942-SDP0006028, SDP0013263, SDP0006029-  
SDP0006031, SDP0013264-SDP0013268, SDP0013305-SDP0013310 and SDP0006032-  
SDP0006067.

58. Attached hereto as **Exhibit 55** are true and correct copies of championship season  
game schedules for certain minor league affiliates of the San Francisco Giants, bearing Bates  
Numbers SFG0045142-SFG0045165, SFG0045588-SFG0045596, SFG0045629-SFG0045637,  
SFG0045166-SFG0045209, SFG0045597-SFG0045605, SFG0045638-SFG0045646,  
SFG0045210-SFG0045217, SFG0045606-SFG0045614, SFG0045647-SFG0045655,  
SFG0045218-SFG0045241, SFG0045615-SFG0045619, SFG0045656-SFG0045660,  
SFG0045242-SFG0045269, SFG0045620-SFG0045628 and SFG0045661-SFG0045669.

59. Attached hereto as **Exhibit 56** are true and correct copies of championship season  
game schedules for certain minor league affiliates of the Seattle Mariners, bearing Bates  
Numbers SEA0044567-SEA0044575, SEA0044608-SEA0044616, SEA0043275-SEA0043346,  
SEA0044576-SEA0044584, SEA0043347-SEA0043406, SEA0044603-SEA0044607,  
SEA0044617-SEA0044621, SEA0043407-SEA0043526, SEA0040131, SEA0044585-  
SEA0044593, SEA0044622-SEA0044630, SEA0043527-SEA0043634, SEA0044594-  
SEA0044602 and SEA0044631-SEA0044648.

60. Attached hereto as **Exhibit 57** are true and correct copies of championship season  
game schedules for certain minor league affiliates of the St. Louis Cardinals, bearing Bates  
Numbers STL0035378-STL0035407, STL0035971-STL0035975, STL0035990-STL0035994,  
STL0035408-STL0035439, STL0035976-STL0035984, STL0035995-STL0036003,  
STL0035440-STL0035472, STL0035985-STL0035989 and STL0036004-STL0036008.

61. Attached hereto as **Exhibit 58** are true and correct copies of championship season  
game schedules for certain minor league affiliates of the Tampa Bay Rays, bearing Bates  
Numbers TBR0000386-TBR0000414, TBR0000521-TBR0000529, TBR0000554-TBR0000562,  
TBR0000439-TBR0000462, TBR0000530-TBR0000538, TBR0000563-TBR0000571,

1 TBR0000463-TBR0000477, TBR0000539-TBR0000543, TBR0000572-TBR0000576,  
 2 TBR0000478-TBR0000501, TBR0000544-TBR0000552, TBR0000577-TBR0000585,  
 3 TBR0000502-TBR0000516, TBR0000553 and TBR0000586-TBR0000590.

4 62. Attached hereto as **Exhibit 59** are true and correct copies of championship season  
 5 game schedules for certain minor league affiliates of the Texas Rangers, bearing Bates Numbers  
 6 TEX0032934-TEX0032937, TEX0033272-TEX0033280, TEX0033313-TEX0033321,  
 7 TEX0032938-TEX0032961, TEX0033281-TEX0033289, TEX0033322-TEX0033330,  
 8 TEX0032962-TEX0032985, TEX0033290-TEX0033298, TEX0033331-TEX0033339,  
 9 TEX0032986-TEX0033010, TEX0033340-TEX0033348, TEX0033011-TEX0033035,  
 10 TEX0033299-TEX0033307, TEX0033036-TEX0033050, TEX0033308-TEX0033312 and  
 11 TEX0033349-TEX0033353.

12 63. Attached hereto as **Exhibit 60** are true and correct copies of championship season  
 13 game schedules for certain minor league affiliates of the Toronto Blue Jays, bearing Bates  
 14 Numbers TOR0048094-TOR0048189, TOR0051595-TOR0051596, TOR0051629-  
 15 TOR0051633, TOR0048190-TOR0048225, TOR0051597-TOR0051605, TOR0051634-  
 16 TOR0051642, TOR0048226-TOR0048324, TOR0051606-TOR0051614, TOR0051643-  
 17 TOR0051651, TOR0048325-TOR0048408, TOR0051615-TOR0051623, TOR0051652-  
 18 TOR0051660, TOR0048409-TOR0048420, TOR0051624-TOR0051628 and TOR0051661-  
 19 TOR0051665.

20 64. Attached hereto as **Exhibit 61** are true and correct copies of championship season  
 21 game schedules for certain minor league affiliates of the Washington Nationals, bearing Bates  
 22 Numbers WAS0001821-WAS0001836, WAS0002224-WAS0002228, WAS0002266-  
 23 WAS0002270, WAS0002247-WAS0002256, WAS0002298-WAS0002306, WAS0002271-  
 24 WAS0002279, WAS0001837-WAS0001859, WAS0002229-WAS0002237, WAS0002280-  
 25 WAS0002288, WAS0001860-WAS0001880, WAS0002238-WAS0002246, WAS0002289-  
 26 WAS0002297, WAS0001881-WAS0001903, WAS0002247-WAS0002256, WAS0002298-  
 27 WAS0002306, WAS0001904-WAS0001933 and WAS0002257-WAS0002265.

65. Attached hereto as **Exhibit 62** is a true and correct copy of an aerial image of the Arizona Diamondbacks' Spring Training Facility, which was marked as Exhibit 280 at the Deposition of Michael Bell, taken on February 2, 2016.

66. Attached hereto as **Exhibit 63** is a true and correct copy of an aerial image from Google Maps of the Atlanta Braves' Spring Training Facility at Champion Stadium, taken on or about October 27, 2021.

67. Attached hereto as **Exhibit 64** is a true and correct copy of an aerial image of the Atlanta Braves' Spring Training Facility at CoolToday Park, which was marked as Exhibit 4 at the 30(b)(6) Deposition of Atlanta National League Baseball Club, Inc., taken on June 18, 2021.

68. Attached hereto as **Exhibit 65** is a true and correct copy of an aerial image from Google Maps of the Baltimore Orioles' Spring Training Facility at Ed Smith Stadium, taken on or about October 19, 2021.

69. Attached hereto as **Exhibit 66** is a true and correct copy of an aerial image from Google Maps of the Boston Red Sox's Spring Training Facility at City of Palms Park, taken on or about October 27, 2021.

70. Attached hereto as **Exhibit 67** is a true and correct copy of an aerial image from Google Maps of the Boston Red Sox's Spring Training Facility at JetBlue Park, taken on or about October 19, 2021.

71. Attached hereto as **Exhibit 68** is a true and correct copy of an aerial image of the Chicago Cubs' Spring Training Facility, which was marked as Exhibit P-1 at the Deposition of Brian Harper, taken on October 14, 2015.

72. Attached hereto as **Exhibit 69** is a true and correct copy of an aerial image of the Chicago White Sox's Spring Training Facility, which was marked as Exhibit 7 at the 30(b)(6) Deposition of Chicago White Sox Ltd., taken on June 16, 2021.

73. Attached hereto as **Exhibit 70** is a true and correct copy of an aerial image of the Cincinnati Reds' Spring Training Facility, which was marked as Exhibit 126 at the Deposition of William Bavasi, taken on December 15, 2015.

1       74.       Attached hereto as **Exhibit 71** is a true and correct copy of an aerial image of the  
2 Cleveland Indians' Spring Training Facility, which was marked as Exhibit 5 at the 30(b)(6)  
3 Deposition of Cleveland Indians Baseball Co., L.P. & Cleveland Indians Baseball Co., Inc.,  
4 taken on June 9, 2021.

5       75.       Attached hereto as **Exhibit 72** is a true and correct copy of an aerial image of the  
6 Colorado Rockies' Spring Training Facility, which was marked as Exhibit 242 at the Deposition  
7 of Zachary Wilson, taken on January 21, 2016.

8       76.       Attached hereto as **Exhibit 73** is a true and correct copy of an aerial image of the  
9 Detroit Tigers' Spring Training Facility, which was marked as Exhibit 5 at the Deposition of  
10 Dave Owen, taken on October 15, 2015.

11       77.       Attached hereto as **Exhibit 74** is a true and correct copy of an aerial image of the  
12 Houston Astros' Spring Training Facility at Osceola County Stadium, which was marked as  
13 Exhibit 344 at the Deposition of Quinton McCracken, taken on February 19, 2016.

14       78.       Attached hereto as **Exhibit 75** is a true and correct copy of an aerial image of the  
15 Kansas City Royals' Spring Training Facility, which was marked as Exhibit 159 at the  
16 Deposition of Scott Sharp, taken on January 7, 2016.

17       79.       Attached hereto as **Exhibit 76** is a true and correct copy of an aerial image of the  
18 Los Angeles Angels' Spring Training Facility, which was marked as Exhibit 135 at the  
19 Deposition of Bobby Scales, taken on December 16, 2015.

20       80.       Attached hereto as **Exhibit 77** is a true and correct copy of an aerial image of the  
21 Los Angeles Dodgers' Spring Training Facility, which was marked as Exhibit 343 at the  
22 Deposition of Gabe Kapler, taken on February 4, 2016.

23       81.       Attached hereto as **Exhibit 78** is a true and correct copy of an aerial image of the  
24 Roger Dean Chevrolet Stadium, which was marked as Exhibit 75 at the Deposition of Brian  
25 Chattin, taken on November 18, 2015.

26       82.       Attached hereto as **Exhibit 79** is a true and correct copy of an aerial image of the  
27 Milwaukee Brewers' Spring Training Facility, which was marked as Exhibit 1 at the Deposition  
28 of Tony Diggs, taken on November 4, 2015.

1       83.       Attached hereto as **Exhibit 80** is a true and correct copy of an aerial image of the  
2 Minnesota Twins' Spring Training Facility, which was marked as Exhibit 113 at the Deposition  
3 of James Rantz, taken on December 8, 2015.

4       84.       Attached hereto as **Exhibit 81** is a true and correct copy of an aerial image of the  
5 New York Mets' Spring Training Facility, which was marked as Exhibit 1 at the Deposition of  
6 Frank Viola, taken on October 29, 2015.

7       85.       Attached hereto as **Exhibit 82** is a true and correct copy of an aerial image from  
8 Google Maps of the New York Yankees' Spring Training Facility, taken on or about October 19,  
9 2021.

10       86.       Attached hereto as **Exhibit 83** is a true and correct copy of an aerial image from  
11 Google Maps of the Oakland Athletics' Spring Training Facility at Papago Park Sports Facility,  
12 taken on or about October 27, 2021.

13       87.       Attached hereto as **Exhibit 84** is a true and correct copy of an aerial image from  
14 Google Maps of the Oakland Athletics' Spring Training Facility at Fitch Park, taken on or about  
15 October 19, 2021.

16       88.       Attached hereto as **Exhibit 85** is a true and correct copy of an aerial image of the  
17 Philadelphia Phillies' Spring Training Facility, which was marked as Exhibit 11 at the 30(b)(6)  
18 Deposition of The Phillies, taken on June 7, 2021.

19       89.       Attached hereto as **Exhibit 86** is a true and correct copy of an aerial image of the  
20 Pittsburgh Pirates' Spring Training Facility, which was marked as Exhibit 172 at the Deposition  
21 Shedrick Bennett, taken on January 12, 2016.

22       90.       Attached hereto as **Exhibit 87** is a true and correct copy of aerial image of the San  
23 Diego Padres' Spring Training Facility, which was marked as Exhibit 314 at the Deposition of  
24 Randall Smith, taken on February 2, 2016.

25       91.       Attached hereto as **Exhibit 88** is a true and correct copy of an aerial image from  
26 Google Maps of the San Francisco Giants' Spring Training Facility, taken on or about October  
27 27, 2021.

1       92.       Attached hereto as **Exhibit 89** is a true and correct copy of an aerial image of the  
2 Seattle Mariners' Spring Training Facility, which was marked as Exhibit 25 at the Deposition of  
3 Chris Gwynn, taken on October 21, 2015.

4       93.       Attached hereto as **Exhibit 90** is a true and correct copy of an aerial image of the  
5 Roger Dean Chevrolet Stadium, which was marked as Exhibit 89 at the Deposition of John  
6 Vuch, taken on November 20, 2015.

7       94.       Attached hereto as **Exhibit 91** is a true and correct copy of an aerial image of the  
8 Tampa Bay Rays' Spring Training Facility at Charlotte Sports Complex, which was marked as  
9 Exhibit 6 at the 30(b)(6) Deposition of Tampa Bay Rays Baseball Ltd., taken on June 23, 2021.

10       95.       Attached hereto as **Exhibit 92** is a true and correct copy of an aerial image of the  
11 Texas Rangers' Spring Training Facility at Surprise Stadium, which was marked as Exhibit 325  
12 at the Deposition of Casey Candaele, taken on February 3, 2016.

13       96.       Attached hereto as **Exhibit 93** is a true and correct copy of an aerial image of the  
14 Toronto Blue Jays' Spring Training Facility at Bobby Mattick Training Center, which was  
15 marked as Exhibit 204 at the Deposition of Douglas Davis, taken on January 21, 2016.

16       97.       Attached hereto as **Exhibit 94** is a true and correct copy of an aerial image from  
17 Google Maps of the Toronto Blue Jays' Spring Training Facility at Dunedin Stadium, taken on  
18 or about October 27, 2021.

19       98.       Attached hereto as **Exhibit 95** is a true and correct copy of an aerial image from  
20 Google Maps of the Toronto Blue Jays' Spring Training Facility at Jack Russell Memorial  
21 Stadium, taken on or about October 27, 2021.

22       99.       Attached hereto as **Exhibit 96** is a true and correct copy of an aerial image of the  
23 Washington Nationals' Spring Training Facility at The Ballpark of the Palm Beaches, which was  
24 marked as Exhibit 1 at the 30(b)(6) Deposition of Washington Nationals Baseball Club, LLC,  
25 taken on June 28, 2021.

26       100.       Attached hereto as **Exhibit 97** is a true and correct copy of an aerial image from  
27 Google Maps of the Washington Nationals' Spring Training Facility at USSSA Space Coast  
28 Stadium, taken on or about October 27, 2021.

1       101.       Attached hereto as **Exhibit 98** is a true and correct copy of the relevant excerpts  
2 from the Arizona Diamondbacks' Fourth Supplemental Answers and Objections to Plaintiffs'  
3 First Set of Interrogatories to Franchise Defendants, dated April 2, 2021.

4       102.       Attached hereto as **Exhibit 99** is a true and correct copy of the relevant excerpts  
5 from the Chicago Cubs' Fourth Supplemental Answers and Objections to Plaintiffs' First Set of  
6 Interrogatories to Franchise Defendants, dated June 25, 2021.

7       103.       Attached hereto as **Exhibit 100** is a true and correct copy of the relevant excerpts  
8 from the Cincinnati Reds' Second Supplemental Answers and Objections to Plaintiffs' First Set  
9 of Interrogatories to Franchise Defendants, dated April 2, 2021.

10       104.       Attached hereto as **Exhibit 101** is a true and correct copy of the relevant excerpts  
11 from the Colorado Rockies' Third Supplemental Answers and Objections to Plaintiffs' First Set  
12 of Interrogatories to Franchise Defendants, dated April 2, 2021.

13       105.       Attached hereto as **Exhibit 102** is a true and correct copy of the relevant excerpts  
14 from the Detroit Tigers' Second Supplemental Answers and Objections to Plaintiffs' First Set of  
15 Interrogatories to Franchise Defendants, dated April 19, 2021.

16       106.       Attached hereto as **Exhibit 103** is a true and correct copy of the relevant excerpts  
17 from the Houston Astros' Third Supplemental Answers and Objections to Plaintiffs' First Set of  
18 Interrogatories to Franchise Defendants, dated April 2, 2021.

19       107.       Attached hereto as **Exhibit 104** is a true and correct copy of the relevant excerpts  
20 from the Kansas City Royals' Second Supplemental Answers and Objections to Plaintiffs' First  
21 Set of Interrogatories to Franchise Defendants, dated April 2, 2021.

22       108.       Attached hereto as **Exhibit 105** is a true and correct copy of the relevant excerpts  
23 from the Los Angeles Angels' Third Supplemental Answers and Objections to Plaintiffs' First  
24 Set of Interrogatories to Franchise Defendants, dated June 25, 2021.

25       109.       Attached hereto as **Exhibit 106** is a true and correct copy of the relevant excerpts  
26 from the Los Angeles Dodgers' Third Supplemental Answers and Objections to Plaintiffs' First  
27 Set of Interrogatories to Franchise Defendants, dated June 25, 2021.

28



1        110.        Attached hereto as **Exhibit 107** is a true and correct copy of the relevant excerpts  
2 from the Miami Marlins' Second Supplemental Answers and Objections to Plaintiffs' First Set of  
3 Interrogatories to Franchise Defendants, dated April 2, 2021.

4        111.        Attached hereto as **Exhibit 108** is a true and correct copy of the relevant excerpts  
5 from the Milwaukee Brewers' Second Supplemental Answers and Objections to Plaintiffs' First  
6 Set of Interrogatories to Franchise Defendants, dated April 19, 2021.

7        112.        Attached hereto as **Exhibit 109** is a true and correct copy of the relevant excerpts  
8 from the Minnesota Twins' Second Supplemental Answers and Objections to Plaintiffs' First Set  
9 of Interrogatories to Franchise Defendants, dated April 2, 2021.

10       113.       Attached hereto as **Exhibit 110** is a true and correct copy of the relevant excerpts  
11 from the New York Mets' Second Supplemental Answers and Objections to Plaintiffs' First Set  
12 of Interrogatories to Franchise Defendants, dated April 19, 2021.

13       114.       Attached hereto as **Exhibit 111** is a true and correct copy of the relevant excerpts  
14 from the New York Yankees' Third Supplemental Answers and Objections to Plaintiffs' First  
15 Set of Interrogatories to Franchise Defendants, dated June 25, 2021.

16       115.       Attached hereto as **Exhibit 112** is a true and correct copy of the relevant excerpts  
17 from the Oakland Athletics' Second Supplemental Answers and Objections to Plaintiffs' First  
18 Set of Interrogatories to Franchise Defendants, dated April 2, 2021.

19       116.       Attached hereto as **Exhibit 113** is a true and correct copy of the relevant excerpts  
20 from the Pittsburgh Pirates' Third Supplemental Answers and Objections to Plaintiffs' First Set  
21 of Interrogatories to Franchise Defendants, dated April 19, 2021.

22       117.       Attached hereto as **Exhibit 114** is a true and correct copy of the relevant excerpts  
23 from the San Diego Padres' Third Supplemental Answers and Objections to Plaintiffs' First Set  
24 of Interrogatories to Franchise Defendants, dated June 25, 2021.

25       118.       Attached hereto as **Exhibit 115** is a true and correct copy of the relevant excerpts  
26 from the San Francisco Giants' Second Supplemental Answers and Objections to Plaintiffs' First  
27 Set of Interrogatories to Franchise Defendants, dated April 19, 2021.  
28

1        119.        Attached hereto as **Exhibit 116** is a true and correct copy of the relevant excerpts  
2 from the Seattle Mariners' Second Supplemental Answers and Objections to Plaintiffs' First Set  
3 of Interrogatories to Franchise Defendants, dated April 2, 2021.

4        120.        Attached hereto as **Exhibit 117** is a true and correct copy of the relevant excerpts  
5 from the St. Louis Cardinals' Second Supplemental Answers and Objections to Plaintiffs' First  
6 Set of Interrogatories to Franchise Defendants, dated April 2, 2021.

7        121.        Attached hereto as **Exhibit 118** is a true and correct copy of the relevant excerpts  
8 from the Texas Rangers' Second Supplemental Answers and Objections to Plaintiffs' First Set of  
9 Interrogatories to Franchise Defendants, dated April 2, 2021.

10       122.       Attached hereto as **Exhibit 119** is a true and correct copy of the relevant excerpts  
11 from the Toronto Blue Jays' Second Supplemental Answers and Objections to Plaintiffs' First  
12 Set of Interrogatories to Franchise Defendants, dated April 2, 2021.

13       123.       Attached hereto as **Exhibit 120** is a true and correct copy of the Declaration of  
14 Tom Harris, on behalf of the Arizona Diamondbacks, dated March 31, 2021, bearing Bates  
15 Numbers ARI0073955-ARI0073958. Because this document has been marked as "Confidential-  
16 Restricted" pursuant to the Parties' stipulated protective order (Dkt. No. 233), it has been filed  
17 under seal and an administrative motion is being filed along with this motion.

18       124.       Attached hereto as **Exhibit 121** is a true and correct copy of the Declaration of  
19 Kim Childress, on behalf of the Atlanta Braves, dated April 2, 2021, bearing Bates Numbers  
20 ATL0000759-ATL0000762. Because this document has been marked as "Confidential-  
21 Restricted" pursuant to the Parties' stipulated protective order (Dkt. No. 233), it has been filed  
22 under seal and an administrative motion is being filed along with this motion.

23       125.       Attached hereto as **Exhibit 122** is a true and correct copy of the Declaration  
24 Michael Hoppes, on behalf of the Baltimore Orioles, dated April 23, 2021. Because this  
25 document has been marked as "Confidential-Restricted" pursuant to the Parties' stipulated  
26 protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is  
27 being filed along with this motion.  
28

1       126.       Attached hereto as **Exhibit 123** is a true and correct copy of the Declaration of  
2 Ryan Oremus, on behalf of the Boston Red Sox, dated April 15, 2021, bearing Bates Numbers  
3 BOS0002070-BOS0002073. Because this document has been marked as “Confidential-  
4 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
5 under seal and an administrative motion is being filed along with this motion.

6       127.       Attached hereto as **Exhibit 124** is a true and correct copy of the Declaration of  
7 Danielle Lewis, on behalf of the Chicago Cubs, dated April 19, 2021, bearing Bates Numbers  
8 CHC0032687-CHC00322690. Because this document has been marked as “Confidential-  
9 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
10 under seal and an administrative motion is being filed along with this motion.

11       128.       Attached hereto as **Exhibit 125** is a true and correct copy of the Declaration of  
12 Mary Beth Hardina, on behalf of the Chicago White Sox, dated April 2, 2021, bearing Bates  
13 Numbers CWS0001421-CWS0001425. Because this document has been marked as  
14 “Confidential-Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it  
15 has been filed under seal and an administrative motion is being filed along with this motion.

16       129.       Attached hereto as **Exhibit 126** is a true and correct copy of the Declaration of  
17 Bentley Viator, on behalf of the Cincinnati Reds, dated March 30, 2021, bearing Bates Numbers  
18 CIN0032986-CIN0032989. Because this document has been marked as “Confidential-  
19 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
20 under seal and an administrative motion is being filed along with this motion.

21       130.       Attached hereto as **Exhibit 127** is a true and correct copy of the Declaration of  
22 Erica Chambers, on behalf of the Cleveland Indians, dated April 1, 2021, bearing Bates Numbers  
23 CLE0001173-CLE0001176. Because this document has been marked as “Confidential-  
24 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
25 under seal and an administrative motion is being filed along with this motion.

26       131.       Attached hereto as **Exhibit 128** is a true and correct copy of the Declaration of  
27 Michael J. Kent, on behalf of the Colorado Rockies, dated March 25, 2021, bearing Bates  
28 Numbers COL0061266-COL0061269. Because this document has been marked as

1 “Confidential-Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it  
2 has been filed under seal and an administrative motion is being filed along with this motion.

3 132. Attached hereto as **Exhibit 129** is a true and correct copy of the Declaration of  
4 Kelli Kollman, on behalf of the Detroit Tigers, dated April 15, 2021, bearing Bates Numbers  
5 DET0019571-DET0019574. Because this document has been marked as “Confidential-  
6 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
7 under seal and an administrative motion is being filed along with this motion.

8 133. Attached hereto as **Exhibit 130** is a true and correct copy of the Declaration of  
9 Luke Franken, on behalf of the Houston Astros, dated April 1, 2021, bearing Bates Numbers  
10 HOU0027485-HOU0027489. Because this document has been marked as “Confidential-  
11 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
12 under seal and an administrative motion is being filed along with this motion.

13 134. Attached hereto as **Exhibit 131** is a true and correct copy of the Declaration of  
14 David Laverentz, on behalf of the Kansas City Royals, dated March 30, 2021, bearing Bates  
15 Numbers KAN0028839-KAN0028842. Because this document has been marked as  
16 “Confidential-Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it  
17 has been filed under seal and an administrative motion is being filed along with this motion.

18 135. Attached hereto as **Exhibit 132** is a true and correct copy of the Declaration of  
19 Molly Jolly, on behalf of the Los Angeles Angels, dated April 15, 2021, bearing Bates Numbers  
20 LAA0027121-LAA0027124. Because this document has been marked as “Confidential-  
21 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
22 under seal and an administrative motion is being filed along with this motion.

23 136. Attached hereto as **Exhibit 133** is a true and correct copy of the Declaration of  
24 Mary Beth Hardina, on behalf of the Los Angeles Dodgers, dated April, 2, 2021, bearing Bates  
25 Numbers LAD0062662-LAD0062666. Because this document has been marked as  
26 “Confidential-Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it  
27 has been filed under seal and an administrative motion is being filed along with this motion.  
28

1       137.       Attached hereto as **Exhibit 134** is a true and correct copy of the Declaration of  
2 Pam Sartory, on behalf of the Miami Marlins, dated April 1, 2021, bearing Bates Numbers  
3 MIA0053817-MIA0053820. Because this document has been marked as “Confidential-  
4 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
5 under seal and an administrative motion is being filed along with this motion.

6       138.       Attached hereto as **Exhibit 135** is a true and correct copy of the Declaration of  
7 Daniel Fumai, on behalf of the Milwaukee Brewers, dated April 19, 2021, bearing Bates  
8 Numbers MIL0019718-MIL0019721. Because this document has been marked as “Confidential-  
9 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
10 under seal and an administrative motion is being filed along with this motion.

11       139.       Attached hereto as **Exhibit 136** is a true and correct copy of the Declaration of  
12 Andrew Weinstein, on behalf of the Minnesota Twins, dated March 31, 2021, bearing Bates  
13 Numbers MIN0017767-MIN0017770. Because this document has been marked as  
14 “Confidential-Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it  
15 has been filed under seal and an administrative motion is being filed along with this motion.

16       140.       Attached hereto as **Exhibit 137** is a true and correct copy of the Declaration of  
17 Paul Taglieri, on behalf of the New York Mets, dated April 16, 2021, bearing Bates Numbers  
18 NYM0018290-NYM0018293. Because this document has been marked as “Confidential-  
19 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
20 under seal and an administrative motion is being filed along with this motion.

21       141.       Attached hereto as **Exhibit 138** is a true and correct copy of the Declaration of  
22 Anthony Bruno, on behalf of the New York Yankees, dated March 31, 2021, bearing Bates  
23 Numbers NYY0016981-NYY0016984. Because this document has been marked as  
24 “Confidential-Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it  
25 has been filed under seal and an administrative motion is being filed along with this motion.

26       142.       Attached hereto as **Exhibit 139** is a true and correct copy of the Declaration of  
27 Adam Tyhurst, on behalf of the Oakland Athletics, dated April 7, 2021, bearing Bates Numbers  
28 OAK0010347-OAK0010350. Because this document has been marked as “Confidential-

1 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
2 under seal and an administrative motion is being filed along with this motion.

3 143. Attached hereto as **Exhibit 140** is a true and correct copy of the Declaration of  
4 Shannon Snellman, on behalf of the Philadelphia Phillies, dated April 2, 2021, bearing Bates  
5 Numbers PHI0003999-PHI0004002. Because this document has been marked as “Confidential-  
6 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
7 under seal and an administrative motion is being filed along with this motion.

8 144. Attached hereto as **Exhibit 141** is a true and correct copy of the Declaration of  
9 Libby Waltman, on behalf of the Pittsburgh Pirates, dated April 16, 2021, bearing Bates  
10 Numbers PIT0024705-PIT0024708. Because this document has been marked as “Confidential-  
11 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
12 under seal and an administrative motion is being filed along with this motion.

13 145. Attached hereto as **Exhibit 142** is a true and correct copy of the Declaration of  
14 Chris James, on behalf of the San Diego Padres, dated April 2, 2021, bearing Bates Numbers  
15 SDP0013603-SDP0013606. Because this document has been marked as “Confidential-  
16 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
17 under seal and an administrative motion is being filed along with this motion.

18 146. Attached hereto as **Exhibit 143** is a true and correct copy of the Declaration of  
19 Erik Mattias, on behalf of the San Francisco Giants, dated April 16, 2021, bearing Bates  
20 Numbers SFG0046264-SFG0046267. Because this document has been marked as “Confidential-  
21 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
22 under seal and an administrative motion is being filed along with this motion.

23 147. Attached hereto as **Exhibit 144** is a true and correct copy of the Declaration of  
24 Tim Kornegay, on behalf of the Seattle Mariners, dated March 31, 2021, bearing Bates Numbers  
25 SEA0045248-SEA0045251. Because this document has been marked as “Confidential-  
26 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
27 under seal and an administrative motion is being filed along with this motion.  
28

1       148.       Attached hereto as **Exhibit 145** is a true and correct copy of the Declaration of  
2 Pam Sartory, on behalf of the St. Louis Cardinals, dated April 1, 2021, bearing Bates Numbers  
3 STL0037432-STL0037435. Because this document has been marked as “Confidential-  
4 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
5 under seal and an administrative motion is being filed along with this motion.

6       149.       Attached hereto as **Exhibit 146** is a true and correct copy of the Declaration of  
7 Rob Gagliardi, on behalf of the Tampa Bay Rays, dated March 28, 2021, bearing Bates Numbers  
8 TBR0000976-TBR0000979. Because this document has been marked as “Confidential-  
9 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
10 under seal and an administrative motion is being filed along with this motion.

11       150.       Attached hereto as **Exhibit 147** is a true and correct copy of the Declaration of  
12 Starr Gullledge, on behalf of the Texas Rangers, dated March 31, 2021, bearing Bates Numbers  
13 TEX0034329-TEX0034332. Because this document has been marked as “Confidential-  
14 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
15 under seal and an administrative motion is being filed along with this motion.

16       151.       Attached hereto as **Exhibit 148** is a true and correct copy of the Declaration of  
17 Janet Chant, on behalf of the Toronto Blue Jays, dated April 1, 2021, bearing Bates Numbers  
18 TOR0053172-TOR0053175. Because this document has been marked as “Confidential-  
19 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
20 under seal and an administrative motion is being filed along with this motion.

21       152.       Attached hereto as **Exhibit 149** is a true and correct copy of the Declaration of  
22 Ted Towne, on behalf of the Washington Nationals, dated April 2, 2021, bearing Bates Numbers  
23 WAS0005587-WAS0005591. Because this document has been marked as “Confidential-  
24 Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed  
25 under seal and an administrative motion is being filed along with this motion.

26       153.       Attached hereto as **Exhibit 150** is a true and correct copy of the relevant excerpts  
27 of William Alvino’s Deposition (“Alvino Tr.”), taken on June 24, 2016.  
28



1       154.       Attached hereto as **Exhibit 151** is a true and correct copy of the relevant excerpts  
2 of Taylor Jake Anderson’s Deposition (“Anderson Tr.”), taken on June 14, 2016.

3       155.       Attached hereto as **Exhibit 152** is a true and correct copy of the relevant excerpts  
4 of Erik Arnesen’s Deposition (“Arnesen Tr.”), taken on April 28, 2016.

5       156.       Attached hereto as **Exhibit 153** is a true and correct copy of the relevant excerpts  
6 of Craig Bennigson’s Deposition (“Bennigson Tr.”), taken on February 9, 2016.

7       157.       Attached hereto as **Exhibit 154** is a true and correct copy of the relevant excerpts  
8 of Steven Caseres’s Deposition (“Caseres Tr.”), taken on May 6, 2016.

9       158.       Attached hereto as **Exhibit 155** is a true and correct copy of the relevant excerpts  
10 of Christopher Cody’s Deposition (“Cody Tr.”), taken on May 16, 2016.

11       159.       Attached hereto as **Exhibit 156** is a true and correct copy of the relevant excerpts  
12 of Leonard Davis’s Deposition (“L. Davis Tr.”), taken on January 13, 2016.

13       160.       Attached hereto as **Exhibit 157** is a true and correct copy of the relevant excerpts  
14 of Aaron Dott’s Deposition (“Dott Tr.”), taken on

15       161.       Attached hereto as **Exhibit 158** is a true and correct copy of the relevant excerpts  
16 of Grant Duff’s Deposition (“Duff Tr.”), taken on November 4, 2015.

17       162.       Attached hereto as **Exhibit 159** is a true and correct copy of the relevant excerpts  
18 of Lauren Gagnier’s Deposition (“Gagnier Tr.”), taken on October 20, 2015.

19       163.       Attached hereto as **Exhibit 160** is a true and correct copy of the relevant excerpts  
20 of Jonathan Gaston’s Deposition (“Gaston Tr.”), taken on January 12, 2016.

21       164.       Attached hereto as **Exhibit 161** is a true and correct copy of the relevant excerpts  
22 of Nicholas Giarraputo’s Deposition (“Giarraputo Tr.”), taken on November 5, 2015.

23       165.       Attached hereto as **Exhibit 162** is a true and correct copy of the relevant excerpts  
24 of Michael Hart’s Deposition (“Hart Tr.”), taken on June 28, 2016.

25       166.       Attached hereto as **Exhibit 163** is a true and correct copy of the relevant excerpts  
26 of Brandon Henderson’s Deposition (“Henderson Tr.”), taken on February 3, 2016.

27       167.       Attached hereto as **Exhibit 164** is a true and correct copy of the relevant excerpts  
28 of Mitchell Hilligoss’ Deposition (“Hilligoss Tr.”), taken on January 20, 2016.

1        168.        Attached hereto as **Exhibit 165** is a true and correct copy of the relevant excerpts  
2 of Ryan Hutson’s Deposition (“Hutson Tr.”), taken on November 10, 2015.

3        169.        Attached hereto as **Exhibit 166** is a true and correct copy of the relevant excerpts  
4 of Daniel Jimenez’s Deposition (“D. Jimenez Tr.”), taken on June 10, 2016.

5        170.        Attached hereto as **Exhibit 167** is a true and correct copy of the relevant excerpts  
6 of Kyle Johnson’s Deposition (“Johnson Tr.”), taken on June 10, 2021.

7        171.        Attached hereto as **Exhibit 168** is a true and correct copy of the relevant excerpts  
8 of Jake Kahaulelio’s Deposition (“Kahaulelio Tr.”), taken on October 22, 2015.

9        172.        Attached hereto as **Exhibit 169** is a true and correct copy of the relevant excerpts  
10 of Ryan Khoury’s Deposition (“Khoury Tr.”), taken on February 10, 2016.

11       173.        Attached hereto as **Exhibit 170** is a true and correct copy of the relevant excerpts  
12 of Ryan Kiel’s Deposition (“Kiel Tr.”), taken on December 10, 2015.

13       174.        Attached hereto as **Exhibit 171** is a true and correct copy of the relevant excerpts  
14 of Matthew Kramer’s Deposition (“Kramer Tr.”), taken on April 14, 2016.

15       175.        Attached hereto as **Exhibit 172** is a true and correct copy of the relevant excerpts  
16 of Matthew Lawson’s Deposition (“Lawson Tr.”), taken on December 2, 2015.

17       176.        Attached hereto as **Exhibit 173** is a true and correct copy of the relevant excerpts  
18 of Christopher Lashmet’s Deposition (“Lashmet Tr.”), taken on April 5, 2016.

19       177.        Attached hereto as **Exhibit 174** is a true and correct copy of the relevant excerpts  
20 of Michael Liberto’s Deposition (“Liberto Tr.”), taken on November 11, 2015.

21       178.        Attached hereto as **Exhibit 175** is a true and correct copy of the relevant excerpts  
22 of Erik Lis’s Deposition (“Lis Tr.”), taken on May 26, 2016.

23       179.        Attached hereto as **Exhibit 176** is a true and correct copy of the relevant excerpts  
24 of Barret Loux’s Deposition (“Loux Tr.”), taken on June 24, 2021.

25       180.        Attached hereto as **Exhibit 177** is a true and correct copy of the relevant excerpts  
26 of Kyle Mahoney’s Deposition (“Mahoney Tr.”), taken on April 12, 2016.

27       181.        Attached hereto as **Exhibit 178** is a true and correct copy of the relevant excerpts  
28 of Tanner Mathis’ Deposition (“Mathis Tr.”), taken on June 9, 2016.

1       182.       Attached hereto as **Exhibit 179** is a true and correct copy of the relevant excerpts  
2 of Bradley McAtee's Deposition ("McAtee Tr."), taken on December 15, 2015.

3       183.       Attached hereto as **Exhibit 180** is a true and correct copy of the relevant excerpts  
4 of Aaron Meade's Deposition ("Meade Tr."), taken on December 3, 2015.

5       184.       Attached hereto as **Exhibit 181** is a true and correct copy of the relevant excerpts  
6 of Justin Murray's Deposition ("Murray Tr."), taken on February 3, 2016.

7       185.       Attached hereto as **Exhibit 182** is a true and correct copy of the relevant excerpts  
8 of Jeff Nadeau's Deposition ("Nadeau Tr."), taken on November 24, 2015.

9       186.       Attached hereto as **Exhibit 183** is a true and correct copy of the relevant excerpts  
10 of Philip Negus's Deposition ("Negus Tr."), taken on July 9, 2016.

11       187.       Attached hereto as **Exhibit 184** is a true and correct copy of relevant of Brett  
12 Newsome's Deposition ("Newsome Tr."), taken on January 21, 2016.

13       188.       Attached hereto as **Exhibit 185** is a true and correct copy of the relevant excerpts  
14 of Oliver Odle's Deposition ("Odle Tr."), taken on December 1, 2015.

15       189.       Attached hereto as **Exhibit 186** is a true and correct copy of the relevant excerpts  
16 of Jacob Opitz's Deposition ("Opitz Tr."), taken on November 23, 2015.

17       190.       Attached hereto as **Exhibit 187** is a true and correct copy of the relevant excerpts  
18 of Roberto Ortiz's Deposition ("Ortiz Tr."), taken on December 9, 2015.

19       191.       Attached hereto as **Exhibit 188** is a true and correct copy of the relevant excerpts  
20 of Tim Pahuta's Deposition ("Pahuta Tr."), taken on December 17, 2015.

21       192.       Attached hereto as **Exhibit 189** is a true and correct copy of the relevant excerpts  
22 of Dustin Pease's Deposition ("Pease Tr."), taken on December 14, 2015.

23       193.       Attached hereto as **Exhibit 190** is a true and correct copy of the relevant excerpts  
24 of Steven Proscia's Deposition ("Proscia Tr."), taken on April 26, 2016.

25       194.       Attached hereto as **Exhibit 191** is a true and correct copy of the relevant excerpts  
26 of David Quinowski's Deposition ("Quinowski Tr."), taken on January 5, 2016.

27       195.       Attached hereto as **Exhibit 192** is a true and correct copy of the relevant excerpts  
28 of Gaspar Santiago's Deposition ("Santiago Tr."), taken on December 8, 2015.

1        196.        Attached hereto as **Exhibit 193** is a true and correct copy of the relevant excerpts  
2 of Jadd Schmeltzer's Deposition ("Schmeltzer Tr."), taken on June 28, 2016.

3        197.        Attached hereto as **Exhibit 194** is a true and correct copy of the relevant excerpts  
4 of Aaron Senne's Deposition ("Senne Tr."), taken on October 27, 2015.

5        198.        Attached hereto as **Exhibit 195** is a true and correct copy of the relevant excerpts  
6 of Leslie Smith's Deposition ("L. Smith Tr."), taken on February 18, 2016.

7        199.        Attached hereto as **Exhibit 196** is a true and correct copy of the relevant excerpts  
8 of Brad Stone's Deposition ("Stone Tr."), taken on February 2, 2016.

9        200.        Attached hereto as **Exhibit 197** is a true and correct copy of the relevant excerpts  
10 of James Swift's Deposition ("Swift Tr."), taken on March 30, 2016.

11       201.       Attached hereto as **Exhibit 198** is a true and correct copy of the relevant excerpts  
12 of Adam Veres's Deposition ("Veres Tr."), taken on May 17, 2016.

13       202.       Attached hereto as **Exhibit 199** is a true and correct copy of the relevant excerpts  
14 of Kristopher Watts' Deposition ("Watts Tr."), taken on February 11, 2016.

15       203.       Attached hereto as **Exhibit 200** is a true and correct copy of the relevant excerpts  
16 of Nelfi Zapata's Deposition ("Zapata Tr."), taken on June 9, 2016.

17       204.       Attached hereto as **Exhibit 201** is a true and correct copy of the relevant excerpts  
18 of Bill Bavasi's Deposition ("Bavasi Tr."), taken on December 15, 2015.

19       205.       Attached hereto as **Exhibit 202** is a true and correct copy of the relevant excerpts  
20 of Larry Broadway's Deposition ("Broadway Tr."), taken on January 20, 2016.

21       206.       Attached hereto as **Exhibit 203** is a true and correct copy of the relevant excerpts  
22 of Brian Chattin's Deposition ("Chattin Tr."), taken on November 18, 2015.

23       207.       Attached hereto as **Exhibit 204** is a true and correct copy of the relevant excerpts  
24 of Douglas Davis's Deposition ("D. Davis Tr."), taken on January 21, 2016.

25       208.       Attached hereto as **Exhibit 205** is a true and correct copy of the relevant excerpts  
26 of Gabe Kapler's Deposition ("Kapler Tr."), taken on February 4, 2016.

27       209.       Attached hereto as **Exhibit 206** is a true and correct copy of the relevant excerpts  
28 of Bobby Scales' Deposition ("Scales Tr."), taken on December 16, 2015.

210. Attached hereto as **Exhibit 207** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Arizona Diamondbacks, taken on March 31, 2016.

211. Attached hereto as **Exhibit 208** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Atlanta Braves, taken on June 18, 2021.

212. Attached hereto as **Exhibit 209** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Chicago Cubs, taken on May 11, 2016.

213. Attached hereto as **Exhibit 210** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Chicago White Sox, taken on June 16, 2021.

214. Attached hereto as **Exhibit 211** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Cincinnati Reds, taken on April 14, 2016.

215. Attached hereto as **Exhibit 212** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Cleveland Indians, taken on June 9, 2021.

216. Attached hereto as **Exhibit 213** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Colorado Rockies, taken on May 18, 2016.

217. Attached hereto as **Exhibit 214** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Detroit Tigers, taken on May 5, 2016.

218. Attached hereto as **Exhibit 215** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Houston Astros, taken on April 27, 2016.

219. Attached hereto as **Exhibit 216** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Kansas City Royals, taken on May 26, 2016.

220. Attached hereto as **Exhibit 217** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Los Angeles Angels, taken on June 3, 2016.

221. Attached hereto as **Exhibit 218** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Los Angeles Dodgers, taken on May 24, 2016.

222. Attached hereto as **Exhibit 219** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Miami Marlins, taken on April 14, 2016.

223. Attached hereto as **Exhibit 220** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Milwaukee Brewers, taken on April 21, 2016.

224. Attached hereto as **Exhibit 221** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Minnesota Twins, taken on May 4, 2016.

225. Attached hereto as **Exhibit 222** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the New York Mets, taken on May 11, 2016.

226. Attached hereto as **Exhibit 223** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Philadelphia Phillies, taken on June 7, 2021.

227. Attached hereto as **Exhibit 224** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Pittsburgh Pirates, taken on May 25, 2016.

228. Attached hereto as **Exhibit 225** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the San Diego Padres, taken on June 13, 2016.

229. Attached hereto as **Exhibit 226** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the San Francisco Giants, taken on June 7, 2016.

230. Attached hereto as **Exhibit 227** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Seattle Mariners, taken on May 10, 2016.

231. Attached hereto as **Exhibit 228** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the St. Louis Cardinals, taken on May 16, 2016.

232. Attached hereto as **Exhibit 229** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Tampa Bay Rays, taken on June 23, 2021.

233. Attached hereto as **Exhibit 230** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Texas Rangers, taken on April 28, 2016.

234. Attached hereto as **Exhibit 231** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Toronto Blue Jays, taken on June 2, 2016.

235. Attached hereto as **Exhibit 232** is a true and correct copy of the relevant excerpts of the 30(b)(6) Deposition of the Washington Nationals, taken on June 28, 2021.

236. Attached hereto as **Exhibit 233** is a true and correct copy of the relevant excerpts of Brian Kriegler's Deposition ("Kriegler Tr."), taken on September 22, 2021.

237. Attached hereto as **Exhibit 234** is a true and correct copy of the Supplemental Expert Report of Brian Kriegler, Ph.D, dated August 13, 2021. Because this document has been

1 marked as “Confidential” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it  
2 has been filed under seal and an administrative motion is being filed along with this motion.

3 238. Attached hereto as **Exhibit 235** is a true and correct copy of the Expert Report of  
4 Denise N. Martin, Ph.D., dated August 16, 2016. Because certain portions of the document have  
5 been marked as “Confidential” pursuant to the Parties’ stipulated protective order (Dkt. No. 233),  
6 it has been filed under seal in redacted form and an administrative motion is being filed along  
7 with this motion.

8 239. Attached hereto as **Exhibit 236** is a true and correct copy of the Supplemental  
9 Rebuttal Report of Denise N. Martin, Ph.D, dated September 27, 2021. Because certain portions  
10 of the document have been marked as “Confidential” pursuant to the Parties’ stipulated  
11 protective order (Dkt. No. 233), it has been filed under seal in redacted form and an  
12 administrative motion is being filed along with this motion.

13 240. Attached hereto as **Exhibit 237** is a true and correct copy of the Declaration of  
14 Denise N. Martin, Ph.D, in Support of Defendants’ Motion to Exclude Plaintiffs’ Expert Rebuttal  
15 Report and Testimony of Erica L. Groshen, Ph.D., dated October 29, 2021.

16 241. Attached hereto as **Exhibit 238** is a true and correct copy of excerpts of the  
17 Advocates for Minor Leaguers 2021 MLB Draft Handbook.

18 242. Attached hereto as **Exhibit 239** is a true and correct copy of the Major League  
19 Rules, Attachment 3, Minor League Uniform Player Contract, bearing Bates Numbers  
20 MLB0028879-MLB0028904.

21 243. Attached hereto as **Exhibit 240** is a true and correct copy of the Declaration of  
22 Allan H. (“Bud”) Selig, dated July 5, 2016, which was produced to Plaintiffs on July 7, 2016.  
23 After Defendants produced the declaration to Plaintiffs, Plaintiffs abandoned their pursuit of the  
24 deposition of Commissioner Emeritus Selig during fact discovery.

25 244. Attached hereto as **Exhibit 241** is a true and correct copy of Bryan Henry’s  
26 Facebook posts, dated January 2, 2013 to February 16, 2015, which was marked as Exhibit 6 at  
27 his deposition, taken on June 28, 2021.

28



245. Attached hereto as **Exhibit 242** is a true and correct copy of Bryan Henry's Facebook post, dated May 1, 2020, bearing Bates Number MLBHENRB0000267-MLBHENRB0000269.

246. Attached hereto as **Exhibit 243** is a true and correct copy an email dated November 5, 2014, bearing Bates Numbers MLBJOHNK0000002-MLBJOHNK0000003.

247. Attached hereto as **Exhibit 244** is a true and correct copy of an email dated February 2, 2016, bearing Bates Numbers MLBJOHNK0000351-MLBJOHNK0000352.

248. Attached hereto as **Exhibit 245** is a true and correct copy of an email dated January 27, 2016, bearing Bates Numbers MLBJOHNK0000354-MLBJOHNK0000356.

249. Attached hereto as **Exhibit 246** is a true and correct copy an email dated November 22, 2015, bearing Bates Numbers MLBJOHNK0000394-MLBJOHNK0000395.

250. Attached hereto as **Exhibit 247** is a true and correct copy an email dated September 12, 2020, bearing Bates Numbers MLBSEDL0002528-MLBSEDL0002529.

251. Attached hereto as **Exhibit 248** is a true and correct copy an email dated December 21, 2020, bearing Bates Number MLBSEDL0004320.

252. Attached hereto as **Exhibit 249** is a true and correct copy Cody Sedlock's Instagram post, dated February 2, 2020, bearing Bates Number MLBSEDL0004432.

253. Attached hereto as **Exhibit 250** is a true and correct copy of a Boston Red Sox schedule, dated September 19, 2019, bearing Bates Number BOS0000838. Because this document has been marked as "Confidential-Restricted" pursuant to the Parties' stipulated protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is being filed along with this motion.

254. Attached hereto as **Exhibit 251** is a true and correct copy of a Kansas City Royals schedule, bearing Bates Number KAN0014816. Because this document has been marked as "Confidential-Restricted" pursuant to the Parties' stipulated protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is being filed along with this motion.

255. Attached hereto as **Exhibit 252** is a true and correct copy of a Miami Marlins schedule, dated September 12, 2019, bearing Bates Number MIA0053759. Because this

1 document has been marked as “Confidential-Restricted” pursuant to the Parties’ stipulated  
2 protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is  
3 being filed along with this motion.

4 256. Attached hereto as **Exhibit 253** is a true and correct copy of a Philadelphia  
5 Phillies schedule, dated March 2012, bearing Bates Number PHI0001672. Because this  
6 document has been marked as “Confidential-Restricted” pursuant to the Parties’ stipulated  
7 protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is  
8 being filed along with this motion.

9 257. Attached hereto as **Exhibit 254** is a true and correct copy of a Philadelphia  
10 Phillies schedule, dated March 2016, bearing Bates Number PHI0001725. Because this  
11 document has been marked as “Confidential-Restricted” pursuant to the Parties’ stipulated  
12 protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is  
13 being filed along with this motion.

14 258. Attached hereto as **Exhibit 255** is a true and correct copy of a Philadelphia  
15 Phillies schedule, dated March 2017, bearing Bates Number PHI0001753. Because this  
16 document has been marked as “Confidential-Restricted” pursuant to the Parties’ stipulated  
17 protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is  
18 being filed along with this motion.

19 259. Attached hereto as **Exhibit 256** is a true and correct copy of a Philadelphia  
20 Phillies schedule, bearing Bates Number PHI0001772. Because this document has been marked  
21 as “Confidential-Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it  
22 has been filed under seal and an administrative motion is being filed along with this motion.

23 260. Attached hereto as **Exhibit 257** is a true and correct copy of a Philadelphia  
24 Phillies schedule, dated March 2011, bearing Bates Numbers PHI0003627. Because this  
25 document has been marked as “Confidential-Restricted” pursuant to the Parties’ stipulated  
26 protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is  
27 being filed along with this motion.  
28

262. Attached hereto as **Exhibit 259** is a true and correct copy of a Seattle Mariners schedule, bearing Bates Number SEA0039774. Because this document has been marked as “Confidential-Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is being filed along with this motion.

263. Attached hereto as **Exhibit 260** is a true and correct copy of a San Francisco Giants schedule, bearing Bates Number SFG0000058. Because this document has been marked as “Confidential-Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is being filed along with this motion.

264. Attached hereto as **Exhibit 261** is a true and correct copy of a Toronto Blue Jays schedule, dated September 30, 2016, bearing Bates Number TOR0051827. Because this document has been marked as “Confidential-Restricted” pursuant to the Parties’ stipulated protective order (Dkt. No. 233), it has been filed under seal and an administrative motion is being filed along with this motion.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29th day of October, 2021.

Elise M. Bloom